

070138.04

23 December 2013

Ms. Nicole Foley Kraft, Chief
Chief Ground Water Compliance Section
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866
RE: 05NY07108398
Attn: Frank Brock

RE: Request for Information: SDWA-UIC-IR-13-030
Black Bear Campground
197 Wheeler Road, Florida, NY, Orange County
COMPANY CONFIDENTIAL

Dear Ms. Kraft:

Please accept this letter as a response to the letter of November 26, 2013, prepared by Douglas McKenna, in which additional information was requested as it relates to the Black Bear Campground, located in the Town of Warwick, Orange County, New York.

In response to your letter, we offer the following:

1. Black Bear campground includes 2 dump stations. The first dump station is located at the intersection of the road into the campground, and the loop road. The second dump station is near site 150. The dump stations do not receive much use.

We have reviewed the document provided, 'Alert for RV, Boat and Mobile Home Owners and Park Owners About Safe Wastewater Disposal,' EPA 909-F-99-002 dated July 1999. The RV holding tank chemicals market now has many RV holding tank odor control additives that do not include formaldehyde.

- a. At the camp store, Black Bear sells Telamode brand Tela-Blast RV Holding Tank Cleaner, Deodorizer, and Digester. This does not include formaldehyde. The MSDS is attached.

Consistent with industry practice, Black Bear cannot control the chemicals purchased off site in the gray and black water discharged to the dump stations. However, Black Bear has posted 'Alert for RV, Boat and Mobile Home Owners and Park Owners About Safe Wastewater Disposal,' EPA 909-F-99-002, and California Department of Toxic Substances Control 'Chemical Toilet Products Advisory for Consumers Fact Sheet' on bulletin

boards at the campground. These postings serve to make RV owners aware these issues. These practices prevent or minimize the potential discharge of chemicals from RV holding tanks into the facility's septic systems.

- b. Consistent with industry practice, Black Bear has not obtained samples for analysis from septic systems 3 or 10, which receive discharge from the dump stations.
2. Based on the EPA criteria, the following septic systems fall under the jurisdiction of the EPA UIC program: SPDES outfalls 1, 2, 3, 8, 9, 10, 13, 14, 16, 17, 18 & 20. Camp site use by 2 persons was used to make the determination. The remaining outfalls serve fewer than 20 persons per day.
3. The West Record Plan, revised December 23, 2013 is attached.
4. SPDES Permit Outfalls

SPDES Outfall	Sites
1	Office, Store & Laundry Building
2	Pool Restrooms
3	72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, Dump Station
4	1, 3, 5, 7, 9
5	2, 4, 6, 8, 10, 12, 14
6	11, 13, 15, 17, 19, 21, 23, 25
7	16, 18, 20, 22, 24, 26
8	131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, Cabin 142, Cabin 143, Cabin 144, Unnumbered Sites
9	103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113
10	125, 142, 143, 144, 145, 146, 147, 148, 149, 150, Dump Station
11	119, 120, 126, 127, 128, 129, 130
12	121, 122, 123, 124
13	L, M, N, O, P, Q, R, Laundry
14	Restrooms & Showers Building
15	50, 51, 52, 53
16	46, 47, 48, 49, 54, 55, 56, 57, 58, 59, 60, 60A,
17	E, F, G, H, I, J, K, 39, 40, 41, 42, 43, 44, 45, 61, 62, 63
18	A, B, C, D, 36, 37, 38, 64, 65, 66, 67, 68, 69, 70, 71
19	30, 31, 32, 33, 34, 35
20	92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102
21	Unnumbered Sites
22	27, 28, 29

Ms. Nicole Foley Kraft
U.S. Environmental Protection Agency
23 December 2013

We are proceeding with the design for the replacement of the sewage disposal systems at the Black Bear campground site. Many of the outfalls will be abandoned, and new outfalls constructed. We are working with the Orange County Health Department to expedite the design and approval, so that the replacement systems will be in operation prior to the 2014 camping season. As part of this work, we will be applying for a new SPDES permit.

Upon approval of the replacement sewage disposal systems by the Orange County Health Department, we will submit the construction documents for your records. We will also submit the new approved SPDES permit, upon receipt.

5. The 'cisterns' text has been revised to 'cesspools.' The cesspools are for sanitary waste disposal. They were constructed years ago, and are of unknown construction. The middle site has been removed. This system serves the 2 unnumbered sites at this location. This outfall serves a total of 4 persons. Camp site use by 2 persons was used to determine the number of persons served. As this outfall was designed to serve fewer than 20 persons, it is not a large capacity cesspool
6. The dump station, located at the intersection of the road into the camp ground and the loop road, is connected to the septic system serving sites 72-91. The electric service at site 72 is disconnected.
7. Outfall 11, serving Sites 119, 120 & 126-130 consists of 2-275 gal metal perforated tanks. Seven (7) sites are served by this outfall. This outfall serves a total of 14 persons.

Outfall 12, serving Sites 121 – 124 consists of an unknown size metal perforated tank. Four (4) sites are served by this outfall. This outfall serves a total of 8 persons.


As both of these outfalls were designed to serve fewer than 20 persons, neither of these outfalls is a large capacity cesspool.

Ms. Nicole Foley Kraft
U.S. Environmental Protection Agency
23 December 2013

We hope that this memorandum clarifies the issues as it relates to this facility. I would be happy to meet with members of your staff.

If you have any questions or require additional information, do not hesitate to contact me.

Very truly yours,
MJS Engineering & Land Surveying, PC



Bradley G. Cleverley, PE
Project Manager
MJS/kg
Enc.

cc: Howard Smith
Alan Lipman

MATERIAL SAFETY DATA SHEET

Date: January 01, 2012

TELAMODE
BOX 280
INGLESIDE, ON
K0C 1M0

(613) 537-2424
(800) 263-2951
FAX (613) 537-8444

Material Name:

Tela-BLAST
Natural Cleaner and Deodorizer for RV and Marine Holding Tanks

CODE: 9388

Ingredient	CAS NO	%	TLV (ACGIH)
Ethoxylated (6) Tridecyl Alcohol - Alkoxylated linear Alcohols	78330-21-9	3-5%	N/A
Poly(oxethylene/oxypylene)		2-3%	N/A
-monoheylether	52232-09-4		
-monocotylether	37311-02-7		
-monodecylether	37251-67-5		
Viable Bacterial Cultures (largely water)	N/A	gt 70%	N/A
Cherry Fragrance	N/A	1-5%	N/A
Blue Dye	N/A	1-3%	N/A
Disodium Phosphate	7558-79-4	1-3%	N/A
Sodium Nitrate	7631-99-4	1-10%	N/A
Yucca Extract	N/A	1-5%	N/A

Physical State: Liquid
Color: Blue
Odor: Cherry Fragrance
pH: 6.0-9.0
Specific Gravity: 1.0
Boiling Point: 100C /212F
Freezing/Melting Point: Not available.
Vapor Pressure: Equiv to water
Vapor Density: Equiv to water
% Volatile by Volume: Not available.
Evaporation Rate: Not available.
Solubility: 99%
HMIS rating: Health 1, Fire 0, Reactivity 0.



United States
Environmental
Protection Agency

Region 9 Ground Water
Office (WTR-9)


EPA 909-F-99-002
JULY 1999

DO NOT USE CHEMICALS WHICH HARM SEPTIC SYSTEMS

Formaldehyde: active ingredient in some deodorizers, also called Formalin. Formaldehyde is an EPA-recognized probable carcinogen (i.e., causes cancer).

Para-dichlorobenzene: Known carcinogen and drinking water contaminant. Common ingredient in mothballs, urinal cakes and bowl fresheners.

OTHER CHEMICALS TO BEWARE OF INCLUDE heavy metals (such as Zinc), benzene, toluene, xylene, ethylene glycol (anti-freeze), methylene chloride, 1,1,1-trichloroethane (TCA), trichloroethylene (TCE) and perchloroethylene (PCE). Strong acids and bases, such as sulfuric acid or caustic soda, can destroy biological activity and damage tanks and pipes.

 A healthy, well-maintained and appropriately sized septic tank will generally require less pumping over its service life, saving time and money.

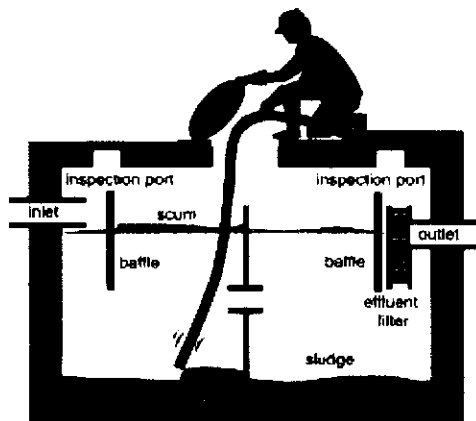
ALERT FOR RV, BOAT AND MOBILE HOME OWNERS AND PARK OPERATORS ABOUT SAFE WASTEWATER DISPOSAL

If you spend any time in a recreational vehicle (RV) or boat, you probably know of the problem of odors from sewage holding tanks. There are a number of commercial products available to control those odors. Some of those products contain chemicals which may pollute water resources. If you use those chemicals and then empty your holding tank into a septic system (or other onsite wastewater treatment system) or dispose of holding tank waste illegally, you may be creating health and environmental hazards. These chemicals and their by-products may pass through onsite wastewater treatment systems, flowing to soil, ground water, and possibly nearby surface waters. They may also corrode treatment system parts, creating a safety hazard.

How septic systems work. A typical septic system contains two major components: a septic tank and an absorption field, also known as a drainfield or leachfield. These systems use natural processes to treat wastewater onsite, as opposed to offsite at a municipal wastewater treatment plant. The purpose of the septic tank is to separate solids from the liquid waste, and to promote partial breakdown of contaminants by microorganisms (bacteria) naturally present in wastewater. The leachfield also treats the wastewater through physical, biological and chemical processes in the soil.

Mixing chemicals with waste in sewage holding tanks or septic systems may produce toxic fumes, corrode pipelines and tanks, and pollute soil and ground water when discharged.

When chemicals, such as formaldehyde, are added to septic systems, they can cause bacteria in the system to die. When this happens, the septic system cannot treat waste adequately. Solids that are allowed to pass from the septic tank, due to inadequate or incomplete treatment, may clog the leachfield. Furthermore, clogged systems may send inadequately or incompletely treated sewage to the surface, threatening the health of people or pets who come into contact with it. Or it may percolate to ground water, where the chemicals and untreated wastewater could contaminate nearby drinking water wells, rivers and streams. Please **read labels carefully** to identify any hazardous ingredients.



© NATIONAL SMALL FLOWS CLEARINGHOUSE

The restoration of contaminated ground water is extremely costly and can take years. To prevent problems, RV and mobile home parks, as well as dump station operators, may take measures to control hazardous chemical disposal into their waste treatment systems. If they do not, and their system causes contamination, they may be forced to **close the dump station or the park** until the problem can be corrected.

**REPORT SEWAGE SPILLS
and other health hazards to the local
health department.
Keep People and Pets Away!**

PARK OPERATORS:

The United States Department of Health, Education and Welfare said in 1957 that "... there are no known chemicals, yeasts, bacteria, enzymes or other substances capable of



eliminating or reducing the solids and scum in a septic tank" and according to EPA, this is still true. No products have been verified by EPA to eliminate the need for routine maintenance, and some may actually accelerate system failure by allowing solids to clog the dispersal system; while the products may claim to "remove" sludge, they may just "move" sludge. Tanks should be checked routinely (see photo) for solids and scum buildup.

Sludge Removal (pumpouts) may be needed more often for RV, Mobile Home and Boat waste systems than for single-family septic systems, especially if your tanks are undersized and/or your residents are conservative with water. Oversizing your tanks, or adding additional tanks, may allow greater waste stabilization. Consult a wastewater professional.



RVers CAN HELP...
Here's How:

- Minimize your need of holding tank deodorizers by using rest stop facilities when you can.

- If you must use a holding tank deodorizer, read the label carefully. **Biodegradable** (enzyme and citrus-based) products are available. Whichever product you

choose, **follow label directions** and add no more than recommended amounts.

- Some products that claim to be flushable, such as some types of cat litter, may clog hoses and septic tanks; use toilets for waste and toilet paper only.

- Ask questions of your park manager about drinking water and wastewater management. Sanitation costs can be minimal, but not free.

- Educate other RVers. Don't be shy about health.

FREE HOTLINES!

Septic System Care: The National Small Flows Clearinghouse, (800) 624-8301, EST, or www.nsfc.wvu.edu
The Safe Drinking Water Act Hotline, US EPA: (800) 426-4791, EST, or www.epa.gov/ogwdw

U.S. EPA, Region 9, WTR-9
Ground Water Office
75 Hawthorne Street
San Francisco, CA 94105-3109
OFFICIAL BUSINESS - PENALTY FOR PRIVATE USE \$300



Our mission is to provide the highest level of safety, and to protect public health and the environment from toxic harm.

Fact Sheet, January 2009

Chemical Toilet Products Advisory for Consumers

Prohibited Chemical Toilet Product Ingredients



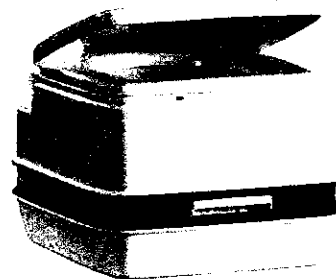
If you own or spend time in a recreational vehicle (RV) or boat, you know of the odor problems coming from the holding tanks used for sewage (grey and black water tanks) and *chemical toilet waste*. There are a number of products available to control these odors, but some of these products may contain chemicals that are banned and cannot be sold or used in *chemical toilets* in California.

Many chemicals are banned in these products, but **formaldehyde**, which is commonly used to reduce odor, in particular, has come to the attention of the Department of Toxic Substances Control (DTSC).

Based on chemical information, formaldehyde may be a *non-biodegradable* toxic chemical substance and you should avoid purchasing and using any chemical toilet product that lists formaldehyde as an ingredient in any concentration.

Background

Chemical toilet products may contain chemicals that are known to cause septic tank failures by killing the bacteria essential to the treatment process in the septic tank. In 1979, the Prohibited Chemical Toilet Additives law was passed and it banned the manufacture, sale and use in California of non-biodegradable toxic chemicals in chemical toilets or waste facilities (toilets). This law was expanded in 1988 to include a similar ban on the sale and use of *halocarbons* in products used to clean or unclog a *sewage disposal system*.



What you need to know about toilet additives

Chemical toilet additives include chemicals that are known to cause septic tank failures by killing the bacteria essential to the treatment process in the septic tank. Formaldehyde can cause these bacteria to die in holding tanks as it controls odor by killing bacteria.

Formaldehyde also kills bacteria necessary to breakdown the wastes to decompose in septic tanks. When your holding tank wastes are disposed into a "dump station" at a campground or RV park (i.e., usually to a septic system), the formaldehyde may kill the bacteria in the septic tank which can eventually clog the system. When a septic system fails, sewage wastes does not breakdown and can cause an increased risk to people from contact with raw sewage.

What you can do to help

- Use holding tank deodorizers that **Do Not Contain Formaldehyde**, and look for **Biodegradable** (enzyme or citrus-based) products instead.
- Minimize your use of holding tank deodorizers by using toilet facilities at rest stops when you can.
- Follow the directions for toilet additives and add only what is recommended.
- Tell other RVers and boaters about what's safe and legal to use in their toilets.

These chemicals have not been evaluated by DTSC, but based on their potential impact to "dump stations" should be avoided in holding tank deodorizers.



DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Our mission is to provide the highest level of safety, and to protect public health and the environment from toxic harm.

Table 1. Active ingredients you should avoid using in your RV holding tank deodorizers.

Active Ingredient	Threats to Human and Environmental Health
Bronopol: (chemical name: bromo-nitropropane-diol)	bacterial pesticide
Dowicil: (chemical name: 1-(3-chlorallyl)-3,4,7-triaza-1-azoniaadamantane chloride)	bacterial pesticide
Glutaraldehyde: (also known as embalming fluid)	Retards bacterial growth and covers sewage odor, eye/inhalation irritant
Paraformaldehyde: (polymerized formaldehyde)	very toxic to humans ¹
Para-dichlorobenzene: (common ingredient in mothballs, urinal cakes, and toilet bowl fresheners)	known carcinogen ² and drinking water contaminant; moderately toxic to humans ³

¹ lethal dose for 150 lb person is between 1 teaspoon to 1 ounce

² a carcinogen causes cancer

³ lethal dose for 150 lb person is between 1 ounce to 1 pint

Source: <http://ag.arizona.edu/pubs/water/az1233.pdf>

Definitions

"*Chemical toilet*" means any portable or permanently installed sanitation apparatus or system which utilizes a tank for toilet waste retention and into which a chemical toilet additive is added.

"*Chemical toilet additive*" means any chemical substance, biological agent, or other material or formulation thereof, which is employed for the primary purpose of controlling waste decomposition and odors in a chemical toilet holding tank or any tank in which chemical toilet wastes are held, collected or transported. The term "chemical toilet additive" includes, but is not limited to, a chemical substance, biological agent or other material which is a deodorant, bactericide, bacteriostat, microbiocide, chemical reactant, surfactant or enzymatic agent.

"*Chemical toilet waste*" means the waste in or from a chemical toilet.

"*Halocarbon chemicals*" means chemical compounds which contain carbon, and one or more halogens, and which may include hydrogen, including, but not limited to, trichloroethane, tetrachloroethylene, methylene chloride, halogenated benzenes, and carbon tetrachloride.

"*Non-biodegradable*" generally means that a chemical does not degrade (breakdown or reduced to a certain strength) when tested to measure how much oxygen bacteria would use to breakdown the chemical over a short period of time.

"*Sewage disposal system*" means a septic tank, cesspool, sewage seepage pit, leachline, or other structure into which sewage is drained for purposes of disposal and which is not connected to a municipal treatment works.

For More Information

For California laws and regulations, consult Chapter 6.5, Article 10, Prohibited Chemicals, Health and Safety Code and Chapter 41, Title 22, California Code of Regulations. For other useful information see <http://www.epa.gov/owm/septic/pubs/rv-wastewater.pdf> or <http://cfpub.epa.gov/owm/septic/index.cfm>.

DTSC Headquarters
1001 I Street
Sacramento, CA 95814-2828
(916) 323-2678

Glendale Office
1011 North Grandview Avenue
Glendale, CA 91201-2205
(818) 551-2830

Clovis Office
1515 Tollhouse Road
Clovis, CA 93611-0522
(559) 297-3901

Berkeley Office
700 Heinz Avenue
Berkeley, CA 94710
(510) 540-3739

Sacramento Office
8800 Cal Center Drive
Sacramento, CA 95826
(916) 255-3617

Cypress Office
5796 Corporate Avenue
Cypress, CA 90630
(714) 484-5400

or visit www.dtsc.ca.gov

SEE MAP

Black Bear Campground

DWG. NO.C-2

NO.	DATE	REVISION
B	12/23/2013	CSSPOOLS TEXT
A	8/30/2013	PROGRESS PRINT
BY	1	CK.

MICHAEL J. SANDOR PE
NY PROFESSIONAL ENGINEER NO. 60445

DRAWN BY: P. HUTTON
DEPT. CK. M. SANDOR
DEP. APPR.
COORD. CK.
P.M. APPR.
CLIENT APPR.

MJS ENGINEERING &
LAND SURVEYING, PC
281 Greenwich Ave
Goshen, NY 10924
845-231-8650
Fax: 845-231-8657

SHEET TITLE:

WEST RECORD PLAN

JOB NAME:

BLACK BEAR
CAMPGROUND
TOWN OF WARWICK, ORANGE COUNTY, NEW YORK

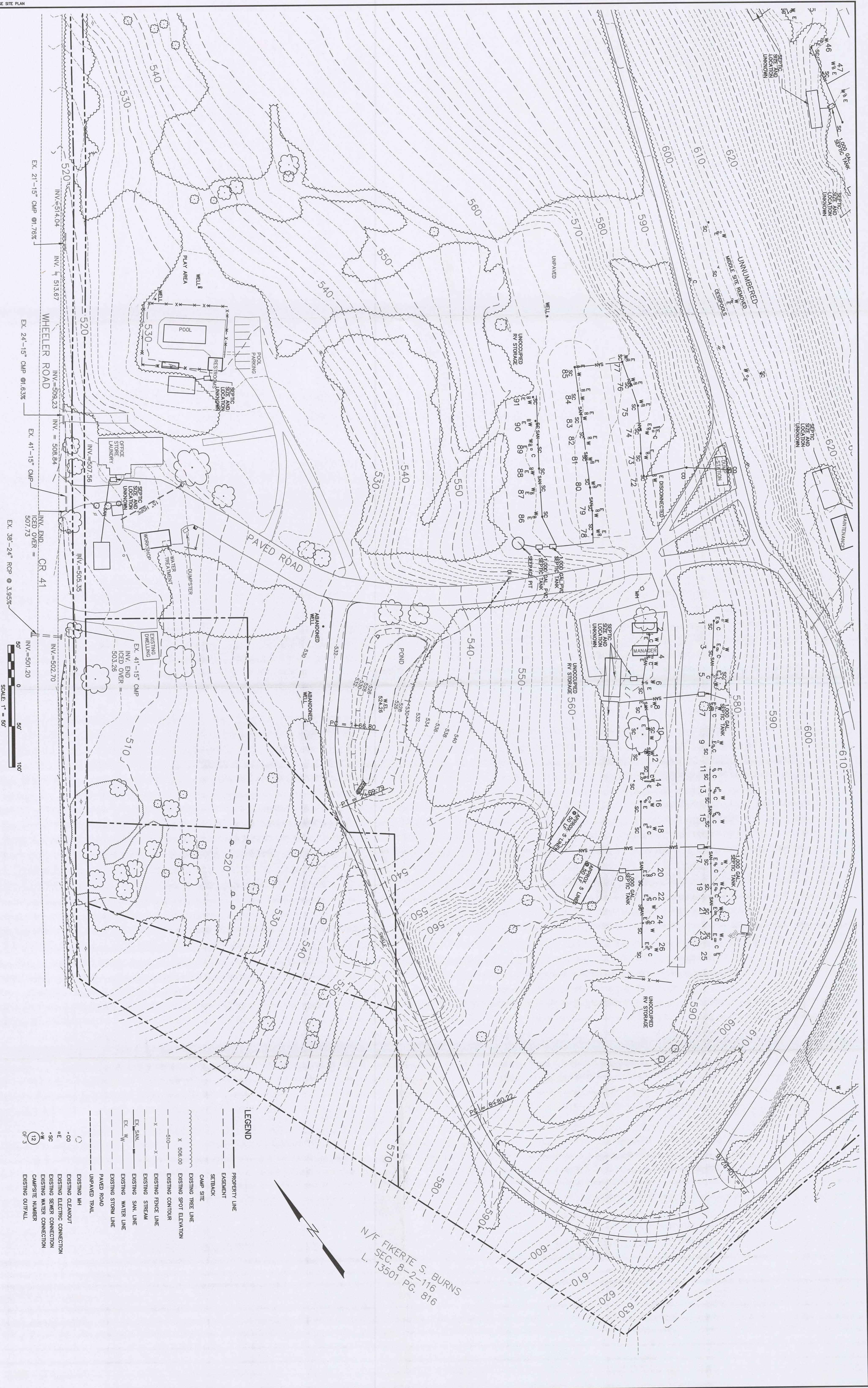
DATE: 8/30/2013

JOB NO.
070138.01

SCALE:
1"=50'

REV. NO. B

C-2
SHEET 2 OF 4



N/F FIKERTE S. BURNS
SEC. 8-2-116
L. 13501 PG. 816

F 11-11-13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

NOV 26 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article number: 7005 3110 0000 5939 9491

Howard Smith
310 Thomas Street
Hurley, New York 12443

Re: Underground Injection Control (UIC) Program Regulation
Request for Information: SDWA-UIC-IR-13-030
Black Bear Campground (UICID: 05NY07108398)
197 Wheeler Road
Florida, New York 10921
Orange County

Dear Mr. Smith:

The U.S. Environmental Protection Agency ("EPA") has reviewed MJS Engineering & Land Surveying, PC's ("MJS") submittal of November 4, 2013 in response to EPA's information request letter of September 20, 2013. While the submittal provided much of the information requested by EPA, there are still some areas where additional information is needed. Please provide the additional information within 30 days of receipt of this letter.

1. Based on the information provided, it appears that there are several dump stations at the facility where RV sanitary waste holding tanks can be emptied and that these dump stations discharge directly into the on-site septic systems.

EPA is aware that RV owners often add chemicals to their holding tanks, primarily to control odor issues. A number of these chemical products contain harmful chemicals such as formaldehyde that, if discharged into a septic system, may not only pose a threat to underground sources of drinking water but may also hinder or stop the biologic processes in the septic tank resulting in the discharge of inadequately treated wastewater. The enclosed fact sheet developed by EPA's Region 9 office discusses this concern and options for addressing the issue.

Please submit the following information concerning the handling of RV sanitary waste storage tank discharges:

- a. Detailed steps that Black Bear Campground ("Black Bear") takes to prevent or minimize the potential discharge of chemicals from RV holding tanks into the facility's septic systems.
- b. Copies of any analytical data from any of the septic systems receiving discharge from one or more of the dump stations.

2. MJS made the following statement in its submittal: "In order for you to understand and to make a determination as to whether or not any portion of the campground is under EPA jurisdiction...." The following septic systems fall under the jurisdiction of the EPA UIC program:
 - a. Any septic system receiving any discharges other than sanitary waste including, but not limited to, storm water from catch basins, pool filter backwash, RV tank contents containing chemicals as discussed above, discharges of non-sanitary wastes from floor drains or sink drains in maintenance areas, garages, workshops, etc. EPA notes that the Record Plans depict several buildings and a swimming pool where the non-sanitary wastes listed above may be generated and discharged into the septic system.
 - b. Any septic system receiving solely sanitary waste and designed to serve 20 or more persons per day.

Since Black Bear contracted to design and construct the septic systems at its facility and oversees the day to day operations, it has the information necessary to determine which of the septic systems meet the design and operational criteria listed above. Please advise EPA of which septic systems Black Bear determines meet the above-listed criteria at its facility.

3. Drawing C-1 ("Overall Plan") indicates that there are three detailed Record Plans covering the north, south and west portions of the facility. The submittal only included the North Record Plan and South Record Plan. Please submit a copy of the West Record Plan.
4. The submittal included a copy of the current state-issued SPDES permit that lists 19 permitted outfalls but there was no key submitted that links the SPDES-permitted outfalls to the septic systems depicted on the Record Plans. Please submit a list correlating the SPDES-permitted outfalls to the septic systems on the Record Plans, e.g. "SPDES outfall 14 is the system serving Sites 146 to 151", etc.
5. In the approximate center of the North Record Plan is an area titled "UNNUMBERED" and "MIDDLE SITE TO BE REMOVED". There are no septic system collection lines depicted and the word "Cisterns" appears in the area. Please detail where sanitary waste generated at these sites is discharged as well as the use of the cisterns, e.g. water supply.
6. The North Record Plan depicts the location of a dump station that appears to be connected to the septic system also serving Sites 72-91. Adjacent to the sewer line connecting the dump station to Site 72 is the word "Disconnected". It is unclear if the dump station has been disconnected from the septic system, the electrical hookup for Site 72 has been disconnected, or something else. Please explain what has been disconnected. If the dump station has been disconnected, please advise EPA of whether the dump station is still utilized and, if so, where the discharge now goes.
7. The North Record Plan appears to depict that the sanitary lines serving Sites 121-124 as well as Sites 119-120 and 126-130 discharge to one or more perforated steel tanks without first passing through a septic tank. Please confirm the construction details of the sanitary waste disposal systems serving those sites. Any injection well receiving untreated sanitary waste and designed to serve 20 or more persons per day is defined

by EPA as a large capacity cesspool. Pursuant to 40 Code of Federal Regulations §144.88(a) large capacity cesspools were banned as of April 5, 2005.

Please submit all information to the following address:

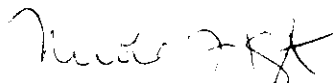
Nicole Foley Kraft, Chief
Ground Water Compliance Section
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866
Re: 05NY07108398
Attn: Frank Brock

Failure to respond to this letter truthfully and accurately within the time provided may subject you to sanctions authorized by federal law. Please also note that all information submitted by you may be used in an administrative, civil judicial, or criminal action. In addition, making a knowing submission of materially false information to the U.S. Government may be a criminal offense.

Pursuant to 40 C.F.R. §§2.203(a) and 144.5, you may, if you desire, assert a business confidentiality claim covering part or all of the information. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R Part 2. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice. You may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as *trade secret*, *proprietary*, or *company confidential*. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. If you desire confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

If you have any questions please contact Frank Brock of my staff at (212) 637-3762 or by e-mail at brock.frank@epa.gov.

Sincerely,



 Douglas McKenna, Chief
Water Compliance Branch

Enclosure

cc: Edwin L. Sims, P.E. (w/enc.)
Acting Director
Division of Environmental Health
Orange County Department of Health
124 Main Street
Goshen, New York 10924

Shohreh Karimipour (w/enc.)
Regional Water Engineer
New York State Dept of Env. Conservation
Region 3 Office
100 Hillside Avenue, Suite 1W
White Plains, New York 10603-2860

Town of Warwick Building Department (w/enc.)
132 Kings Highway
Warwick, New York 10990

Michael J. Sandor, P.E.
MJS Engineering & Land Surveying, PC
261 Greenwich Avenue
Goshen, NY 10924

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Howard Smith
310 Thomas Street
Hurley, New York 12443

2. Article Number

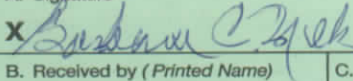
(Transfer from service label)

7005 3110 0000 5939 9491

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type



Certified Mail

☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE

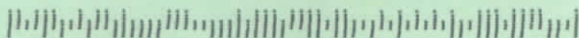


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Permit No. G-10

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U.S. Environmental Protection Agency
Region II, DECA-WCB
290 Broadway, 20th Floor
New York, N.Y. 10007-1886

F. Brock (05NY07108398)





United States
Environmental
Protection Agency

Region 9 Ground Water
Office (WTR-9)

EPA 909-F-99-002
JULY 1999


ALERT FOR RV, BOAT AND MOBILE HOME OWNERS AND PARK OPERATORS ABOUT SAFE WASTEWATER DISPOSAL

DO NOT USE CHEMICALS WHICH HARM SEPTIC SYSTEMS

Formaldehyde: active ingredient in some deodorizers, also called Formalin. Formaldehyde is an EPA-recognized probable carcinogen (i.e., causes cancer).

Para-dichlorobenzene: Known carcinogen and drinking water contaminant. Common ingredient in mothballs, urinal cakes and bowl fresheners.

OTHER CHEMICALS TO BEWARE OF INCLUDE heavy metals (such as Zinc), benzene, toluene, xylene, ethylene glycol (anti-freeze), methylene chloride, 1,1,1-trichloroethane (TCA), trichloroethylene (TCE) and perchloroethylene (PCE). Strong acids and bases, such as sulfuric acid or caustic soda, can destroy biological activity and damage tanks and pipes.

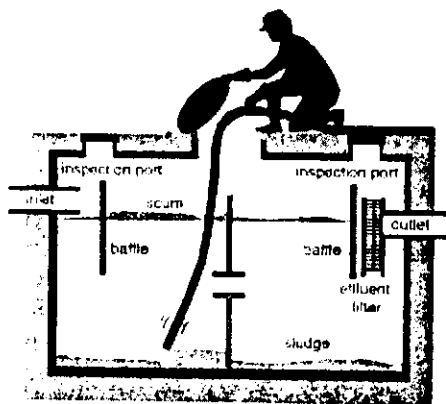
 A healthy, well-maintained and appropriately sized septic tank will generally require less pumping over its service life, saving time and money.

If you spend any time in a recreational vehicle (RV) or boat, you probably know of the problem of odors from sewage holding tanks. There are a number of commercial products available to control those odors. Some of those products contain chemicals which may pollute water resources. If you use those chemicals and then empty your holding tank into a septic system (or other onsite wastewater treatment system) or dispose of holding tank waste illegally, you may be creating health and environmental hazards. These chemicals and their by-products may pass through onsite wastewater treatment systems, flowing to soil, ground water, and possibly nearby surface waters. They may also corrode treatment system parts, creating a safety hazard.

How septic systems work. A typical septic system contains two major components: a septic tank and an absorption field, also known as a drainfield or leachfield. These systems use natural processes to treat wastewater onsite, as opposed to offsite at a municipal wastewater treatment plant. The purpose of the septic tank is to separate solids from the liquid waste, and to promote partial breakdown of contaminants by microorganisms (bacteria) naturally present in wastewater. The leachfield also treats the wastewater through physical, biological and chemical processes in the soil.

Mixing chemicals with waste in sewage holding tanks or septic systems may produce toxic fumes, corrode pipelines and tanks, and pollute soil and ground water when discharged.

When chemicals, such as formaldehyde, are added to septic systems, they can cause bacteria in the system to die. When this happens, the septic system cannot treat waste adequately. Solids that are allowed to pass from the septic tank, due to inadequate or incomplete treatment, may clog the leachfield. Furthermore, clogged systems may send inadequately or incompletely treated sewage to the surface, threatening the health of people or pets who come into contact with it. Or it may percolate to ground water, where the chemicals and untreated wastewater could contaminate nearby drinking water wells, rivers and streams. Please **read labels carefully** to identify any hazardous ingredients.



NATIONAL SMALL FLOWS CLEARINGHOUSE

The restoration of contaminated ground water is extremely costly and can take years. To prevent problems, RV and mobile home parks, as well as dump station operators, may take measures to control hazardous chemical disposal into their waste treatment systems. If they do not, and their system causes contamination, they may be forced to **close the dump station or the park** until the problem can be corrected.

**REPORT SEWAGE SPILLS
and other health hazards to the local
health department.
Keep People and Pets Away!**

PARK OPERATORS:

The United States Department of Health, Education and Welfare said in 1957 that "... there are no known chemicals, yeasts, bacteria, enzymes or other substances capable of



eliminating or reducing the solids and scum in a septic tank" and according to EPA, this is still true. No products have been verified by EPA to eliminate the need for routine maintenance, and some may actually accelerate system failure by allowing solids to clog the dispersal system; while the products may claim to "remove" sludge, they may just "move" sludge. Tanks should be checked routinely (see photo) for solids and scum buildup.

Sludge Removal (pumpouts) may be needed more often for RV, Mobile Home and Boat waste systems than for single-family septic systems, especially if your tanks are undersized and/or your residents are conservative with water. Oversizing your tanks, or adding additional tanks, may allow greater waste stabilization. Consult a wastewater professional.

Cloggers

diapers, cat litter, cigarette filters, coffee grounds, grease, etc.

Killers

household chemicals, gasoline, motor oil, pesticides, antifreeze, paint, etc.

RVers CAN HELP...
Here's How:

- Minimize your need of holding tank deodorizers by using rest stop facilities when you can.

- If you must use a holding tank deodorizer, read the label carefully. **Biodegradable** (enzyme and citrus-based) products are available. Whichever product you

choose, **follow label directions** and add no more than recommended amounts.

- Some products that claim to be flushable, such as some types of cat litter, may clog hoses and septic tanks; use toilets for waste and toilet paper only.
- Ask questions of your park manager about drinking water and wastewater management. Sanitation costs can be minimal, but not free.
- Educate other RVers. Don't be shy about health.

FREE HOTLINES!

Septic System Care: The National Small Flows Clearinghouse, (800) 624-8301, EST, or www.nsfcc.wvu.edu
The Safe Drinking Water Act Hotline, US EPA: (800) 426-4791, EST, or www.epa.gov/ogwdw

U.S. EPA, Region 9, WTR-9
Ground Water Office
75 Hawthorne Street
San Francisco, CA 94105-3109
OFFICIAL BUSINESS - PENALTY FOR PRIVATE USE \$300

Brock, Frank

From: Bennett, James
Sent: Wednesday, November 20, 2013 3:23 PM
To: Brock, Frank
Subject: RE: Residential vs. Non-Residential

Also a typical large septic system at a community residential sewage only receives a lot of chemicals from cleaners, how would this be any different... See the list below of typical cleaners and the associated chemicals that would be entering a septic system.

<http://www.rodalenews.com/environmental-working-group-cleaners-database>

From: Bennett, James
Sent: Wednesday, November 20, 2013 3:19 PM
To: Brock, Frank
Subject: RE: Residential vs. Non-Residential

Frank, I agree with number two below... There is a case to be made that RVs add chemicals to there black tanks in order to control odor and some of these are not ideal are they any different to chemicals added to home toilets? I do not know the answer to this question and would need to look further. I use enzyme only additives in my RV for this reason alone. In terms of capacity I would say any commercial septic system at a campground most likely would have the ability to serve 20 or more people, even with only 6 campsites this would easily meet that threshold. I know a lot of the chemicals for RVs now advertise without formaldehyde because it is known that this can also harm the RV system over time as well... A lot of campgrounds have a dump station where you pull your RV up and dump the tanks into the septic tank directly and I do not know how you would enforce which RVs have which chemicals in their tanks... I assume you could require monitoring or have the campground require RV owners to only use certain additives and have the campground educate the public.

2. If we consider a campground to be "non-residential", as the implication of "residential" is that it is or can be permanent(?), then only septic systems having the capacity to serve 20 or more persons would be subject to UIC.

http://www.rvlifestyleexperts.com/pdfs/RV_HOLDING_TANK_CHEMICALS.pdf

From: Platt, Steve
Sent: Tuesday, November 19, 2013 2:39 PM
To: Bennett, James
Subject: FW: Residential vs. Non-Residential

Jim,

Can you provide any insight to Frank on this. There have been some replies to his question, and most tend to agree with proposed scenario #2. At a camp ground, how do you really know what's going into the septic system. You can assume sanitary waste, but can you be sure?



Ground Water & Enforcement Branch (3WP22)
Office of Drinking Water & Source Water Protection
U.S. EPA Region III
215-814-5464

From: Brock, Frank
Sent: Tuesday, November 19, 2013 11:48 AM
To: Platt, Steve; Hildebrandt, Kurt; Leissner, Ray
Cc: Kobelski, Bruce; Jollie, Jeff
Subject: Residential vs. Non-Residential

Hl gents! I'm sure this has come up in the past, but my search for relevant guidance has thus far been unfruitful. I also looked at some of the preambles and didn't find any helpful language, so thought I'd touch bases with y'all to see if you know off the top of your heads where any relevant info might be.

As the result of a citizen complaint, we are dealing with a seasonal campground that has 19 septic systems receiving flow from anywhere from 3 campsites up to 10 or more, plus laundries, shower facilities, etc. I am wrestling with the question of which of these systems are EPA-regulated Class V wells. There are a couple of scenarios:

1. If we consider a campground to be “residential” (because, after all, what does a campground provide on a temporary basis?), then they may fall under the specific inclusion of a septic system “used by a multiple dwelling, community, or Regional system for the injection of wastes” (since all systems serve multiple campsites/RV hookups) and all of the septic systems, regardless of their capacity, would be regulated.
2. If we consider a campground to be “non-residential”, as the implication of “residential” is that it is or can be permanent(?), then only septic systems having the capacity to serve 20 or more persons would be subject to UIC.
3. If we consider any of the waste to be “non-sanitary” then it would be regulated. However, all wastes are generated from residential-type activities (laundry, bathroom, showers, etc.) with the possible exception of an on-site swimming pool (may inject filter backwash?). So with the possible exception of the filter backwash, most systems receive “sanitary waste” only.

I am leaning towards #2 as the better and more defensible

In response to our IRL, they provided design flow information for each of the systems (anywhere from 320 to 1680 gpd) but how to translate that to persons is problematic. I have found published flow data indicating the assumption for a campground is 30 gallons per person per day so any system designed to receive more than 600 gpd would likely be regulated.

I am going to throw at least some of this back into their court-they must have used some kind of assumptions to design each system, so I think they should determine which of the systems meet the 20-person threshold and are federally regulated....unless a campground (and motel, etc.) are considered “residential”..

In any case, have you guys dealt with campground septic systems (or motels, B&Bs and the like) and, if so, consider them residential or non-residential? And if non-residential, how did you evaluate their being “large capacity” or not? Thanks! Frank

Frank Brock

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Fax: (212) 637-4211

Brock, Frank

From: Janes, Elizabeth
Sent: Tuesday, November 19, 2013 4:55 PM
To: Hildebrandt, Kurt; Brock, Frank; Platt, Steve; Leissner, Ray
Cc: Kobelski, Bruce; Jollie, Jeff; Greenberg, Leslie
Subject: RE: Residential vs. Non-Residential at RV hookup sites

Hi Frank and everybody – by way of email I am introducing Leslie Greenberg to the Class V workgroup. Since I have moved to enforcement, she has rejoined the UIC program to be the R9 Class V contact.

Here's the outcome of the R9 investigation of RV park systems: <http://www.epa.gov/region9/water/groundwater/uic-pdfs/rv-wastewater.pdf>.

It has been a long time since I checked whether or not states had outlawed sale of such ingredients for the purpose of holding tank deodorizer (1990s.) This came to our attention as the result of several dead lagoons in the Parker Strip area of the Colorado River. It was a sanitarian in Washington State who did most of the research, Dave Lenning, that was then picked up by a U of AZ professor Kit Farrell-Poe. Beyond those initial dead systems I never heard of any additional backups.

We never did any sampling to determine if the chemicals Lenning saw for sale in Washington were in the soil in Arizona.

Dedicating a holding tank for newcomers' loads was the answer for some of the parks. Oversizing the septic tank capacity to allow the biocidal agents time to be diluted or degraded worked in other cases.

Your situation – I agree with Kurt – regulate them as non-residential unless they can prove they have controls in place to segregate contaminated deodorized loads from regular hookups. Do they have a preflush holding tank that newcomers have to use prior to connection? Do they have any maintenance records to show that the holding tank is pumped?

Elizabeth Janes

Database Administrator, Injection Wells and RCRAinfo
USEPA Region 9, E-4-1

75 Hawthorne Street, SF, CA 94105

Phone 415 972 3537, FAX 947 3549

Register injection wells at www.epa.gov/region09/water/groundwater/injection-wells-register.html

For more information see: www.epa.gov/region09/water/groundwater/index.html

From: Hildebrandt, Kurt
Sent: Tuesday, November 19, 2013 1:08 PM
To: Brock, Frank; Platt, Steve; Leissner, Ray; Janes, Elizabeth
Cc: Kobelski, Bruce; Jollie, Jeff
Subject: RE: Residential vs. Non-Residential

I'd suggest that you get with Liz Janes out in R9 as she had done research about problems that can be caused by RV tank additives and was the one who alerted me to possible issues.

When it comes to sites like this where you have a bunch of systems and some may not quite meet the criteria at first blush, it seems best to error on the side of registering them all. That way the inspector isn't having to figure out who's in and who's out and if they do find an issue, it's easier to address it as a whole rather than piecemeal.

Kurt F. Hildebrandt
US Environmental Protection Agency - Region 7
Water, Wetlands & Pesticides Division
11201 Renner Boulevard
Lenexa, Kansas 66219

Voice: 913-551-7413

FAX: 913-551-9413

From: Brock, Frank

Sent: Tuesday, November 19, 2013 2:44 PM

To: Hildebrandt, Kurt; Platt, Steve; Leissner, Ray

Cc: Kobelski, Bruce; Jollie, Jeff

Subject: RE: Residential vs. Non-Residential

When selecting the proper tank design, do they take into account the proximity of Mexican places, fast food restaurants, etc.? Seriously, did not know that about RV tank additives. I think we got some sampling data-have to look to see if any formaldehyde, etc..... Most if not all of the campsites have RV hookups according to the site plans. In addition, they have 2-3 dump stations at the place, all discharging to septic systems. Thanks for the info! Frank

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From: Hildebrandt, Kurt

Sent: Tuesday, November 19, 2013 3:03 PM

To: Brock, Frank; Platt, Steve; Leissner, Ray

Cc: Kobelski, Bruce; Jollie, Jeff

Subject: RE: Residential vs. Non-Residential

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Brock, Frank

From: Brock, Frank
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To: Hildebrandt, Kurt; Janes, Elizabeth
Subject: RE: Residential vs. Non-Residential

Thanks! I was thinking about including Region 9 when I e-mailed y'all and promptly forgot. Yea, now that you have raised the issue of additives, especially formaldehyde, would like to know if it's caused impacts anywhere. New York state's discharge to ground water standard is 8 micrograms per liter and I found the abstract of a research paper online indicating formaldehyde concentrations in 72 samples of RV holding tanks was 170 milligrams/liter. That paper is a bit dated (1986) and there are now many greener products available though I also found MSDSs for current products still containing formaldehyde.

Hi Liz! Anything to add concerning RV holding tank additives? We are dealing with a seasonal campground/RV park with 19 septic systems receiving flow from the campsites (most or all have RV hookups) as well as 2-3 dump stations. I was trying to grapple with the whole residential or non-residential issue in trying to figure out if the 20 person/day regulatory limit applied when Kurt opened this whole other can of worms. So if you could share any experience y'all have had with this issue, I'd appreciate it! Frank

P.s.: here is the paper abstract I found-did not find the paper (at least not for free):

TREATABILITY OF RECREATIONAL VEHICLE WASTEWATER IN SEPTIC SYSTEMS AT HIGHWAY REST AREAS

Accession Number:

00450681

Record Type:

Component

Availability:

Transportation Research Board Business Office

500 Fifth Street, NW

Washington, DC 20001 USA

Order URL: <http://www.trb.org/Publications/Pages/262.aspx>

Find a library where document is available

Order URL: <http://worldcat.org/issn/03611981>

Abstract:

Recreational vehicle (RV) owners commonly use chemical toilet additives containing formaldehyde to minimize odors from their wastewater holding tanks. The purpose of this study is to determine the character and treatability of this wastewater using conventional septic tank-drainfield systems at highway rest areas. RV wastewater is a high-strength waste. Mean concentrations from 72 samples are 5-day biochemical oxygen demand (BOD5) 3110 mg per liter, chemical oxygen demand (COD) 8230 mg per liter, total suspended solids (TSS) 3120 mg per liter, and volatile suspended solids (VSS) 2640 mg per liter, with a formaldehyde concentration of 170 mg per liter. The average volume per vehicle is 62 liters. Because RV wastewater is highly concentrated, sludge and scum accumulation and pumpout interval should be considered in addition to hydraulic residence time when sizing septic tanks for RV waste. A model for sludge and scum accumulation is developed based on the concept that some organic material in sludge and scum is readily degradable

and compactible, some is degradable and compactible with extended residence time, and some material is inert and not compactible.

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United States
Environmental
Protection Agency

Region 9 Ground Water
Office (WTR-9)

EPA 909-F-99-002
JULY 1999

ALERT FOR RV, BOAT AND MOBILE HOME OWNERS AND PARK OPERATORS ABOUT SAFE WASTEWATER DISPOSAL

DO NOT USE CHEMICALS WHICH HARM SEPTIC SYSTEMS

Formaldehyde: active ingredient in some deodorizers, also called Formalin. Formaldehyde is an EPA-recognized probable carcinogen (i.e., causes cancer).

Para-dichlorobenzene: Known carcinogen and drinking water contaminant. Common ingredient in mothballs, urinal cakes and bowl fresheners.


OTHER CHEMICALS TO BEWARE OF INCLUDE heavy metals (such as Zinc), benzene, toluene, xylene, ethylene glycol (anti-freeze), methylene chloride, 1,1,1-trichloroethane (TCA), trichloroethylene (TCE) and perchloroethylene (PCE). Strong acids and bases, such as sulfuric acid or caustic soda, can destroy biological activity and damage tanks and pipes.

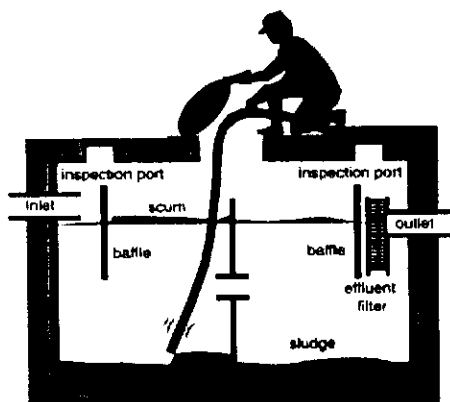
How septic systems work. A typical septic system contains two major components: a septic tank and an absorption field, also known as a drainfield or leachfield. These systems use natural processes to treat wastewater onsite, as opposed to offsite at a municipal wastewater treatment plant. The purpose of the septic tank is to separate solids from the liquid waste, and to promote partial breakdown of contaminants by microorganisms (bacteria) naturally present in wastewater. The leachfield also treats the wastewater through physical, biological and chemical processes in the soil.

Mixing chemicals with waste in sewage holding tanks or septic systems may produce toxic fumes, corrode pipelines and tanks, and pollute soil and ground water when discharged.

When chemicals, such as formaldehyde, are added to septic systems, they can cause bacteria in the system to die. When this happens, the septic system cannot treat waste adequately. Solids that are allowed to pass from the septic tank, due to inadequate or incomplete treatment, may clog the leachfield. Furthermore, clogged systems may send inadequately or incompletely treated sewage to the surface, threatening the health of people or pets who come into contact with it. Or it may percolate to ground water, where the chemicals and untreated wastewater could contaminate nearby drinking water wells, rivers and streams. Please **read labels carefully** to identify any hazardous ingredients.

The restoration of contaminated ground water is extremely costly and can take years. To prevent problems, RV and mobile home parks, as well as dump station operators, may take measures to control hazardous chemical disposal into their waste treatment systems. If they do not, and their system causes contamination, they may be forced to **close the dump station or the park** until the problem can be corrected.

 A healthy, well-maintained and appropriately sized septic tank will generally require less pumping over its service life, saving time and money.



* NATIONAL SMALL FLOWS CLEARINGHOUSE

REPORT SEWAGE SPILLS
and other health hazards to the local
health department.
Keep People and Pets Away!

PARK OPERATORS:

The United States Department of Health, Education and Welfare said in 1957 that "... there are no known chemicals, yeasts, bacteria, enzymes or other substances capable of



eliminating or reducing the solids and scum in a septic tank" and according to EPA, this is still true. No products have been verified by EPA to eliminate the need for routine maintenance, and some may actually accelerate system failure by allowing solids to clog the dispersal system; while the products may claim to "remove" sludge, they may just "move" sludge. Tanks should be checked routinely (see photo) for solids and scum buildup.

Sludge Removal (pumpouts) may be needed more often for RV, Mobile Home and Boat waste systems than for single-family septic systems, especially if your tanks are undersized and/or your residents are conservative with water. Oversizing your tanks, or adding additional tanks, may allow greater waste stabilization. Consult a wastewater professional.

Cloggers

diapers, cat litter, cigarette filters, coffee grounds, grease, etc.

Killers

household chemicals, gasoline, motor oil, pesticides, antifreeze, paint, etc.

RVers CAN HELP...
Here's How:

- Minimize your need of holding tank deodorizers by using rest stop facilities when you can.

- If you must use a holding tank deodorizer, read the label carefully. **Biodegradable** (enzyme and citrus-based) products are available. Whichever product you

choose, **follow label directions** and add no more than recommended amounts.

- Some products that claim to be flushable, such as some types of cat litter, may clog hoses and septic tanks; use toilets for waste and toilet paper only.

- Ask questions of your park manager about drinking water and wastewater management. Sanitation costs can be minimal, but not free.

- Educate other RVers. Don't be shy about health.

FREE HOTLINES!

Septic System Care: The National Small Flows Clearinghouse, (800) 624-8301, EST, or www.nsfcc.wvu.edu
 The Safe Drinking Water Act Hotline, US EPA: (800) 426-4791, EST, or www.epa.gov/ogwdw

U.S. EPA, Region 9, WTR-9
 Ground Water Office
 75 Hawthorne Street
 San Francisco, CA 94105-3109
 OFFICIAL BUSINESS - PENALTY FOR PRIVATE USE \$300

070138.04

4 November 2013

Ms. Nicole Foley Kraft
Chief Ground Water Compliance Section
United States Environmental Protection Agency
290 Broadway, 20th Floor
New York, NY 10007-1866
RE: 05NY07108398
Attn: Frank Brock

RE: Request for Information: SDWA-UIC-IR-13-030
Black Bear Campground
197 Wheeler Road, Florida, NY, Orange County

Dear Mr. Brock:

Please accept this letter as a response to Mr. Douglas McKenna's letter of September 20, 2013, in which additional information was requested as it relates to the Black Bear Campground, located in the Town of Warwick, Orange County, New York.

It is my understanding that the department was concerned with various injection wells as outlined in 40CFR, Part 144.

In order for you to understand and make a determination as to whether or not any portion of the campground is under EPA jurisdiction, I have enclosed a set of plans which outline the collection system and final disposal of all of the areas of the campground. It should be noted that all of the campground areas are served by a collection system which discharges to a septic tank and then goes to a final absorption area which consists of a septic system field (or drywell). It is important to note that all wastewater is domestic waste.

In order for you to gain a better understanding of the various areas, we wish to point out the following:

1. In the area of Campsite G, located along the eastern edge of the property, the owner inadvertently installed a septic tank and two (2) leaching chambers to pick up the units noted as Units E, F, G, H, I and J. At this time, that flow has been completely cut off and re-routed to the western side noted as DEC Outfall #18 (see attached letter dated July 31, 2013, to the NYSDEC).
2. In the vicinity of the laundry which is also along the eastern edge of the property, there was installed a seepage pit which received waste from the laundry. That area has since been reconnected to the septic tank. That septic tank and the final

Mr. Douglas McKenna
U.S. Environmental Protection Agency
4 November 2013

disposal area serves Units L, M, N, O, P, Q, and R (see letter to orange Department of health dated July 27, 2013).

The laundry building has since been closed down and no longer discharges waste.

3. There is an additional area which serves Units 72-86 and consists of (2) in-line 1,000 gallon septic tanks to a final disposal of a seepage pit.

This septic tank and seepage pit arrangement was constructed sometime after 1965.

In order to fully address your letter, we offer the following additional information:


- We have provided an overall plan of the campground and final means of disposal of each outfall.
- The sources and actual estimated volumes of all fluids serving each outfall are outlined in the SPDES Permit dated March 13, 2008 (copy enclosed).
- All discharges are sanitary wastewater.
- We do note that there was a failure in the vicinity of the laundry due to the wastewater which was flowing into a drywell. The Orange County Department of Health cited this violation in their letter of July 16, 2013 (copy attached), and it is noted that the flow has been rerouted to the septic tank which discharges to a final disposal area. We further note that the laundry facility has been closed since July of this year.

We hope that this memorandum clarifies the issues as it relates to this facility.

I would be happy to meet with members of your staff to fully evaluate whether or not the USEPA has the jurisdiction to evaluate this facility.

If you have any questions or require additional information, do not hesitate to contact me.

Very truly yours,
MJS Engineering & Land Surveying, PC



Michael J. Sandor, PE
President
MJS/kg
Enc.

cc: Howard Smith
Alan Lipman

070138.04

31 July 2013

Mr. Shohreh Karimipour
Regional Water Engineer
NYS Dept of Environmental Conservation
100 Hillside Avenue, Suite 1W
White Plains, NY 10603-2860

FILE COPY

RE: Black Bear Campground SPDES # NY 0144938
Town of Warwick, Orange County, New York

Dear Mr. Karimipour:

We received a copy of a letter that was sent to Black Bear Campground dated July 11, 2013, which requested the owner to provide the department with a Closure Plan for the septic system constructed on an adjacent property (Neeman), behind Site G, as shown on the attached plan.

I visited the site and verified that the septic system has been mistakenly constructed on the adjacent property. Now that the system is not receiving effluent, we formally request a Closure Plan approval so the system can be completely removed from the property. The re-routing of the collection system has been completed so the effluent now goes to an approved location (See letter to the Orange County Health Department dated 7/27/2013). This system was not part of the SPDES permit issued for this property, but was a system that was mistakenly installed on a neighboring property. As of July 27, 2013, the flow to this system was redirected to the Outfall approved under the SPEDES permit for this property.

Closure Plan Procedures:

1. Obtain permission to go on the property and conduct the removal.
2. Completely pump out the 1000 gallon septic tank utilizing a licensed hauler.
3. Completely remove the septic tank and distribution lines which we understand to be two leaching chambers.
4. Remove all components completely.
5. Replace all removed components with clean, fill.
6. Provide topsoil, seed, and stabilize with mulch.

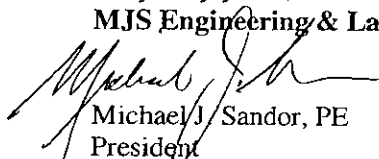
Mr. Shohreh Karimipour
Regional Water Engineer
NYS Dept of Environmental Conservation
31 July 2013

We believe that if properly followed, this procedure will be satisfactory.

We will await your approval of this Closure Plan.

If you have any questions or require additional information, do not hesitate to contact our office.

Very truly yours,
MJS Engineering & Land Surveying, PC



Michael J. Sandor, PE
President
MJS/kg
Enc.

cc: Howard Smith
Alan Lipman, Esq.
Manju Cherian, P.E.

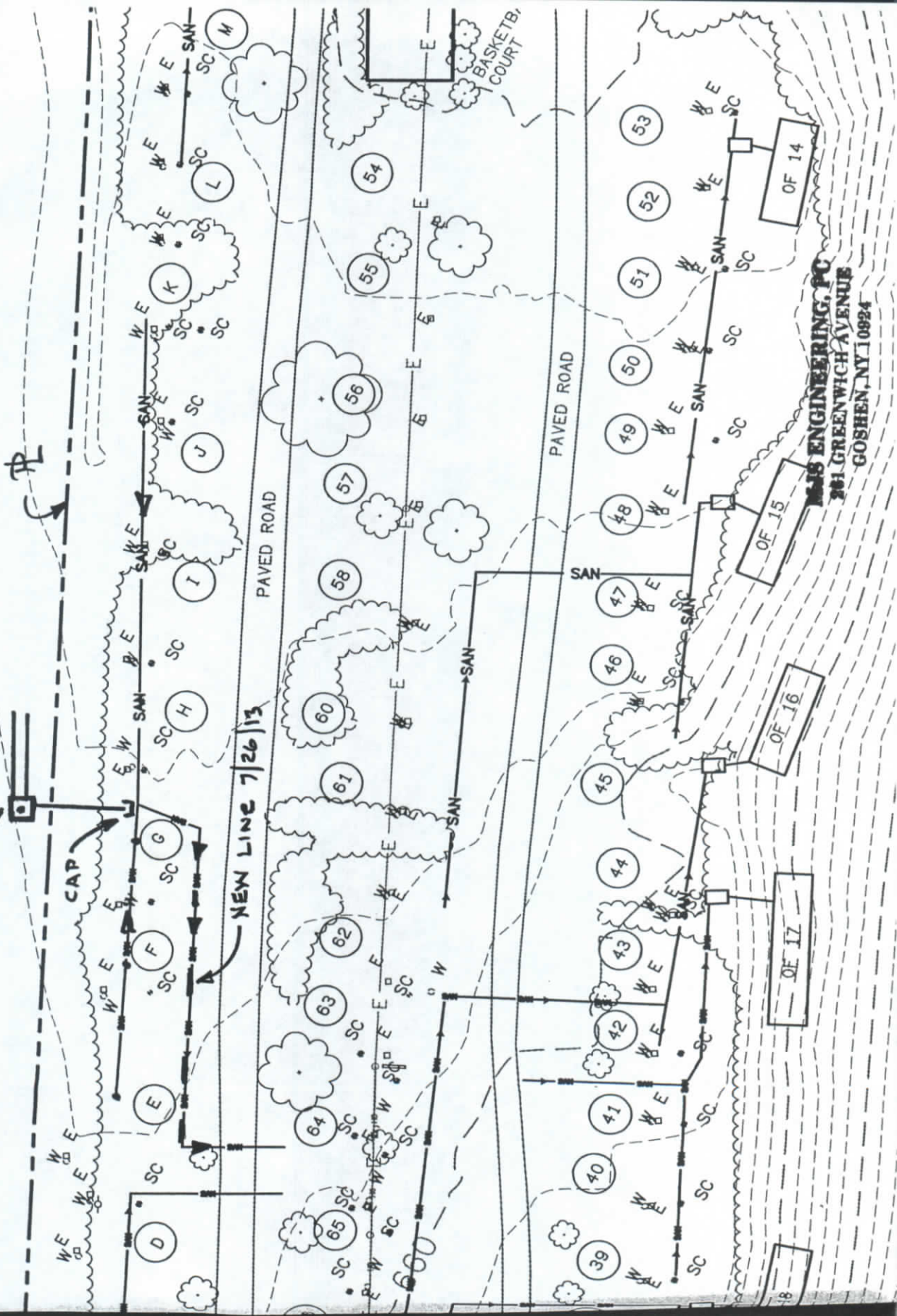
BLACK BEAR CAMPGROUND SEPTIC CLOSURE PLAN T. WARWICK, NY, ORANGE CO.

SK-1 8/1/13

8-2-26.52
N/F NEEMAN

N
1"=50'

SEPTIC TANK & CHAMBER



070138.04

27 July 2013

Mr. Edwin Sims, PE,
Acting Director of Env. Health
Orange County Department of Health
124 Main Street
Goshen, NY 10924

RE: Black Bear Campground – 197 Wheeler Road
Town of Warwick

Dear Mr. Sims:

Pursuant to our conversation on Friday July 26, 2013, please note that Mr. Howard Smith of Black Bear Campground has completed the following remediation of the septic systems as outlined in correspondence both from your department and the New York State Department of Environmental Conservation (NYSDEC). Specifically, the following items have been addressed:

1. Discharge to the surface in the vicinity of the laundry:

The laundry area as shown on the attached plan appears to be a system that was originally approved in the 1980s and issued a SPDES Permit on July 31, 1980. It also serves seven campground spaces (L, M, N, O, P, Q, and R) and the laundry. A few years back the campground routed the laundry waste and placed it into a seepage pit. According to our conversations, untreated effluent was found to be discharging to the surface. In order to remediate this situation, the campground routed that discharge directly into the septic system which was originally designed to service this building. The seepage pit is no longer functioning and there is no longer discharge to the surface.

2. Septic System Encroachment onto Property Owned by Neeman (8-2-26.52):

A few years back it was noticed that units E, F, G, H, I, J and K, were having trouble discharging into the collection system. The campground decided to install a new septic tank and leaching chambers to treat the effluent.

Mr. Edwin Sims, PE, Director
Orange County Health Department
26 July 2013

It was verified that this system was mistakenly installed on the neighboring Neeman property. Working with the campground staff, it was ascertained that the original collection system (for which a SPDES permit has been issued) was crushed just before it crossed the road. In order to eliminate the encroachment of the septic system, it would be a simple fix to reconnect these units back their original configuration so that the sewage is discharged to its original treatment system located on the camp property.

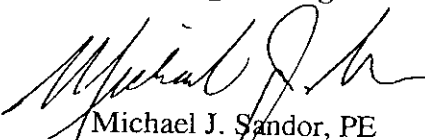
3. Cracked Effluent Pipe Vicinity of Outfall #11:

The disposal system for Outfall 11 has had its effluent pipe repaired.

This work was completed by 4:00PM on Friday, July 26, 2013, and pursuant to our meeting earlier that morning.

If you have any additional questions, do not hesitate to contact me.

Very truly yours,
MJS Engineering & Land Surveying, PC



Michael J. Sandor, PE
President

MJS/kg
Enc.

cc: Howard Smith
Alan Lipman, Esq. ✓

Mr. Edwin Sims, PE, Director
Orange County Health Department
26 July 2013

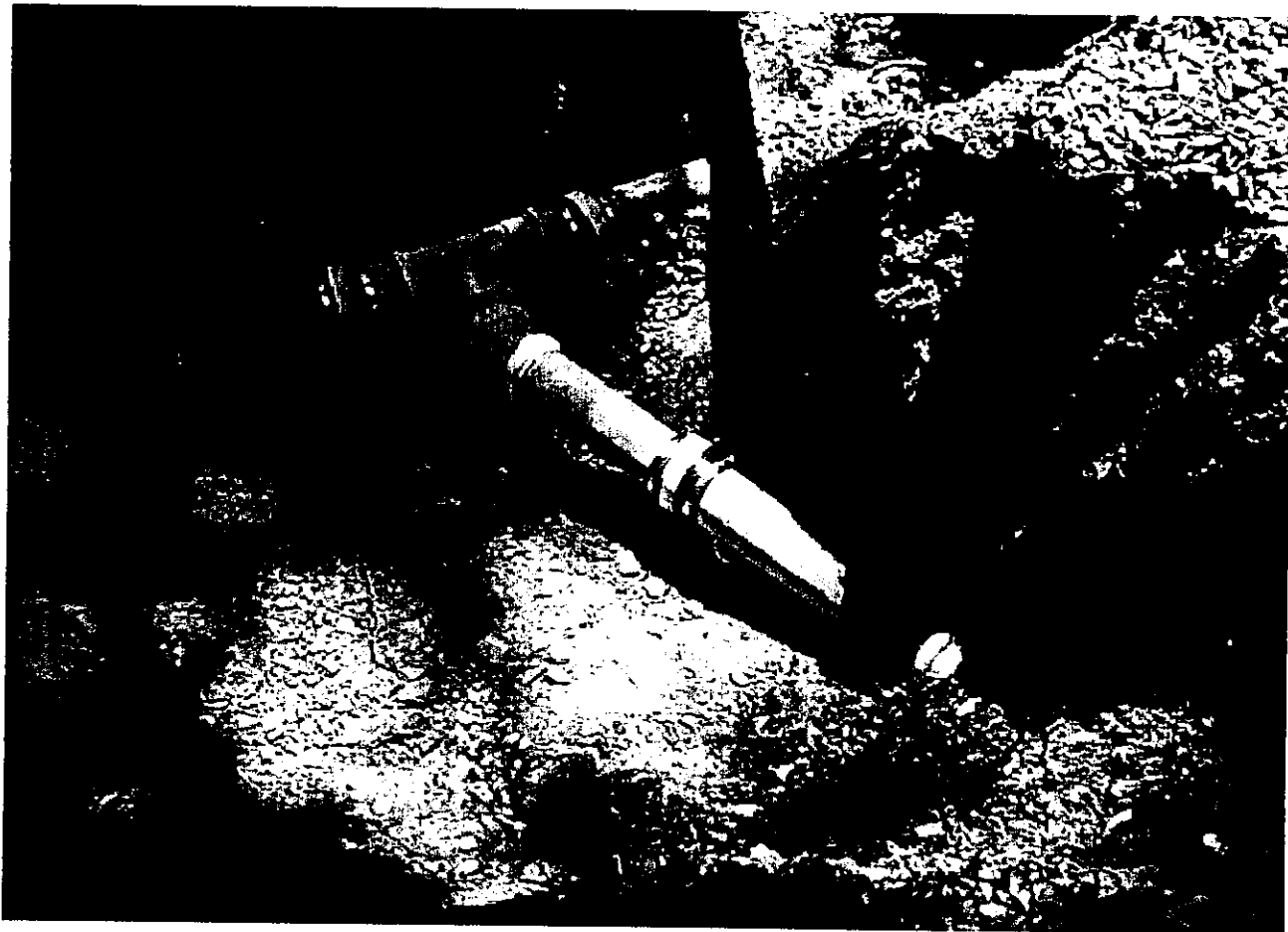


Photo #1 Laundry connector to septic tank.

Mr. Edwin Sims, PE, Director
Orange County Health Department
26 July 2013



Photo #2 Rerouted Collection System Away from Neeman Property.

Mr. Edwin Sims, PE, Director
Orange County Health Department
26 July 2013

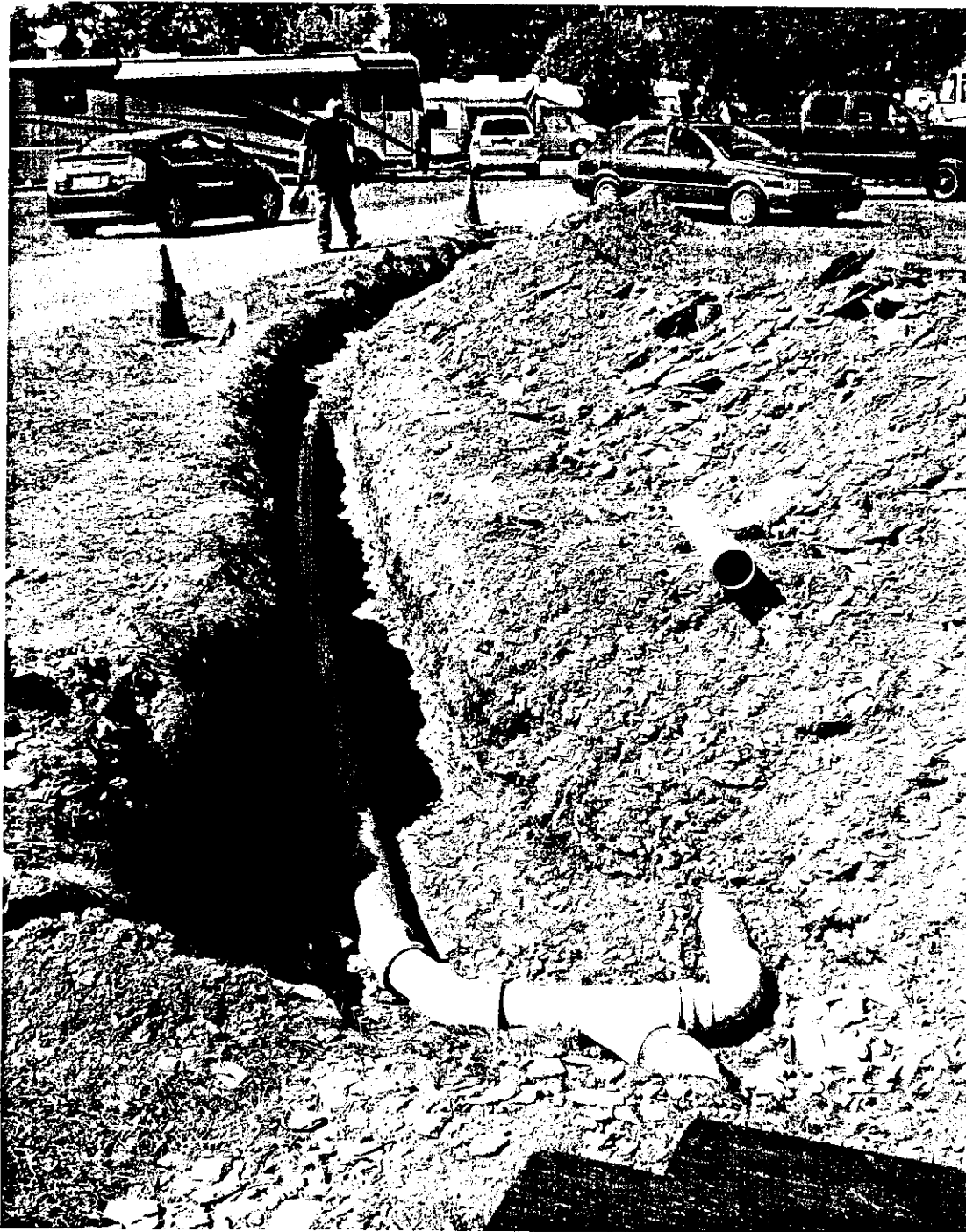


Photo # 3 Re-routed collection System Back to Original Road Crossing.

Mr. Edwin Sims, PE, Director
Orange County Health Department
26 July 2013

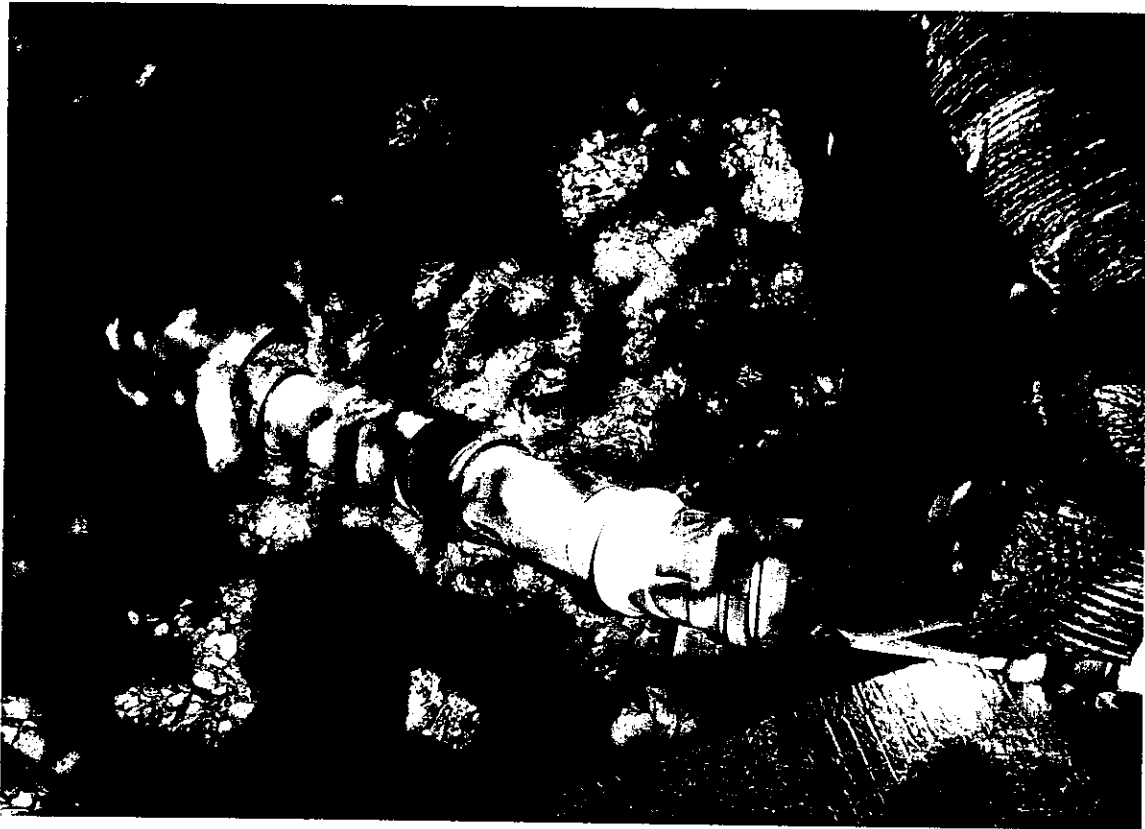


Photo # 4 Repaired Collection System Vicinity Outfall 11.



Edward A. Diana
County Executive

DEPARTMENT OF HEALTH

Eli N. Avila, MD, JD, MPH, FCLM
Commissioner of Health

124 Main Street
Goshen, New York 10924-2199

Environmental Health

(845) 291-2331
Fax: (845) 291-1078

July 16, 2013

RE: Campground
Black Bear Campground
197 Wheeler Rd.
T. Warwick

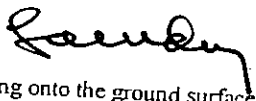
Mr. Howard Smith
Black Bear Campground
P.O. Box 82
Florida, NY 10921

Dear Mr. Smith:

A partial inspection of the above establishment was conducted by J. Graziano, a representative of this department, on July 8, 2013.

You are hereby advised of the following violation considered by the New York State Sanitary Code as being a public health hazard. A public health hazard is a condition that poses a threat to the public health and/or safety and is to be **corrected immediately** when found:

SEWAGE DISPOSAL.


 Sewage was found to be discharging onto the ground surface adjacent to the laundry building. You must take immediate action to provide needed repairs to provide an adequate and functioning disposal system. Any new construction, revision, and/or modification must receive prior approval from this Department and possibly the New York State Department of Environmental Conservation. Any repairs involving replacement, modification or enlargement of your disposal system will require that a professional engineer licensed to practice in New York State prepare plans and specifications.

You are cautioned that further occurrences of this hazard will result in our referral of this matter to the Commissioner of Health for appropriate action. A reinspection is being scheduled for the near future to determine if formal action is to be taken.

Very truly yours,

Timothy J. Gaeta
Senior Public Health Sanitarian

TJG:JG:mt

cc: Dr. Avila
T. Warwick, B.I.
File 

New York State Department of Environmental Conservation
Division of Environmental Permits, 4th Floor

625 Broadway, Albany, New York 12233-1750

Phone: (518) 402-9167 • FAX: (518) 402-9168

Website: www.dec.ny.gov



Alexander B. Grannis
Commissioner

070138

March 14, 2008

PERMITTEE INFORMATION

Howard Smith
PO Box 82
Florida, NY 10921

FACILITY INFORMATION

Name: Black Bear Campground
Location: 197 Wheeler Rd, Warwick, NY
County: Orange
DEC #: 3-3354-00662
SPDES #: NY 014 4983

Dear Permittee:

Enclosed is the State Pollutant Discharge Elimination System (SPDES) discharge permit for Black Bear Campground located in Orange County, New York. It authorizes the subsurface discharge of 16,000 gallons per day of treated sanitary waste through a septic tank with trench system. The permit term will begin April 1, 2008 and expire on March 31, 2018.

Please read it carefully and note the conditions that are included. The permit is valid for only that activity expressly authorized. Work beyond the scope of the permit may be considered a violation of law and be subject to appropriate enforcement action. Granting of this permit does not relieve the permittee of the responsibility of obtaining any other permission, consent or approval from any other federal, state, or local government which may be required.

As the holder of a SPDES permit, you are responsible for requesting a renewal of the permit at least six months prior to the expiration of the permit term. Applications for renewal are reviewed at the Department's Headquarters office located in Albany at the letterhead address. Other transactions regarding your permit, such as application for permit modification, permit transfers to a new owner, owner address changes and name changes, should be directed to the Regional Permit Administrator at the following address:

Margaret Duke, Region 3 Permit Administrator
21 South Putt Corners Road
New Paltz, NY 12561
(845) 256-3054

Please refer to the DEC and SPDES numbers when you are corresponding with any DEC office, or when you are applying to renew or modify this permit.

Sincerely,

Teresa Diehsner
Division of Environmental Permits

Enclosures

c: M. Duke, RPA
T. Rudolph, RWE
DOW-BWP
✓ Bradley Cleverley PE, MJS Engineering

APPLICATION FORM "D"

for a State Pollutant Discharge Elimination System (SPDES) Permit

(A SPDES Application When Signed by a Permit Issuing Official Becomes a SPDES Permit)

NOV 28 2007

PLEASE PRINT OR TYPE

APPLICATION TYPE <input type="checkbox"/> New <input checked="" type="checkbox"/> Re-Issuance <input type="checkbox"/> Modification		IF RE-ISSUANCE OR MODIFICATION, GIVE PREVIOUS NUMBER NY -- 014 4983	
OWNER'S NAME (Corporate, Partnership, Individual) HOWARD SMITH		TYPE OF OWNERSHIP <input type="checkbox"/> Corporate <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Partnership <input type="checkbox"/> Public	
OWNER'S MAILING ADDRESS (Street, City, State, Zip Code) PO BOX 82 FLORIDA NY 10921			
REFER ALL CORRESPONDENCE TO: (Name, Title and Address) BRADLEY G CLEVERLEY PE, MJS ENGINEERING & SURVEY, 261 GREENWICH AVE, GOSHEN NY 10924			TELEPHONE NUMBER (845) 651-7717
FACILITY NAME BLACK BEAR CAMPGROUND		FACILITY LOCATION (Street or Road) 197 WHEELER ROAD	
COUNTY ORANGE	GIVE EXPLICIT DIRECTIONS TO LOCATION ADJACENT TO VILLAGE OF FLORIDA NY 10921		
NATURE OF BUSINESS OR FACILITY RECREATIONAL VEHICLE CAMPGROUND			POPULATION SERVED (See Instructions) 160 SITES
FREQUENCY OF DISCHARGE All Year? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, Specify Number of Months All Week? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, Specify Number of Days			
DOES YOUR DISCHARGE CONTAIN OR IS IT POSSIBLE FOR YOUR DISCHARGE TO CONTAIN ONE OR MORE OF THE FOLLOWING SUBSTANCES ADDED AS A RESULT OF YOUR OPERATIONS, ACTIVITIES OR PROCESSES? Please Check <input type="checkbox"/> Aluminum <input type="checkbox"/> Ammonia <input type="checkbox"/> Beryllium <input type="checkbox"/> Cadmium <input type="checkbox"/> Chlorine <input type="checkbox"/> Chromium <input type="checkbox"/> Copper <input type="checkbox"/> Cyanide <input type="checkbox"/> Grease <input type="checkbox"/> Lead <input type="checkbox"/> Mercury <input type="checkbox"/> Nickel <input type="checkbox"/> Oil <input type="checkbox"/> Phenols <input type="checkbox"/> Selenium <input type="checkbox"/> Zinc <input checked="" type="checkbox"/> None of These			
DISCHARGE DATA (Use additional forms, if necessary) (See Instructions)			
OUTFALL NO. 1	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/ TRENCH
DESIGN FLOW 800 Gal/Day			
SURFACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If YES, Name of Receiving Waters UNNAMED TRIBUTARY TO QUAKER CREEK	
SUBSURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Distance 1800 Ft.	
SOIL TYPE SILT LOAM		Depth to Water Table	
OUTFALL NO. 2	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/ TRENCH
DESIGN FLOW 320 Gal/Day			
SURFACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If YES, Name of Receiving Waters UNNAMED TRIBUTARY TO QUAKER CREEK	
SUBSURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Distance 1800 Ft.	
SOIL TYPE SILT LOAM		Depth to Water Table	
OUTFALL NO. 3	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/ TRENCH
DESIGN FLOW 1,600 Gal/Day			
SURFACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If YES, Name of Receiving Waters UNNAMED TRIBUTARY TO QUAKER CREEK	
SUBSURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Distance 2000 Ft.	
SOIL TYPE SILT LOAM		Depth to Water Table	
I hereby affirm under penalty of perjury that the information provided on this form and any attached supplemental forms is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to section 210.45 of the Penal Law.			
APPLICANT'S SIGNATURE (see Instructions) <i>Howard Smith</i>		DATE 11/23/07	PRINTED NAME HOWARD SMITH
TITLE OWNER			
PERMIT VALIDATION SECTION (Department of Environmental Conservation Use Only) This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the provisions of the Federal Water Pollution Control Act, as amended by the Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500, October 18, 1972 (33 U.S.C. §1251 et. seq.) (hereinafter referred to as "the Act"), and subject to the attached conditions. <i>William K. Abramo</i> 3/13/08 Signature of Permit Issuing Agent Date			
APPLICATION NUMBER NY -- 014 4983		EFFECTIVE DATE 4-1-2008	
EXPIRATION DATE 3-31-2018		ATTACHMENTS: - Other conditions - general	
CARD 1	Type Est. 66	Type Own 68	SIC CODE 70
# Out Falls 74	Dis. Class 76	CARD 3	Region 71
County 72	Major Basin 74	Sub Basin 76	Compact Area 78
CARD 6	Latitude 53	Longitude 59	CARD 7
Lim Ind 57			

APPLICANT

N NO.

NY- 014 4983

EFFECTIVE DATE

4-1-2008

EXPIRATION DATE

3-31-2018

PAGE

2

OF

7

APPLICATION FORM "D" FOR A STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES) PERMIT

Continuation Sheet for Multiple Outfalls

PLEASE PRINT OR TYPE

OWNER'S NAME (Corporate, Partnership or Individual)

HOWARD SMITH

IF RENEWAL OR MODIFICATION, GIVE PREVIOUS NO

NY- 014 4983

CITY NAME

BLACK BEAR CAMPGROUND

CITY, TOWN OR VILLAGE

WARWICK

COUNTY

ORANGE

DISCHARGE DATA (Use additional forms, if necessary) (See Instructions)

OUTFALL NO. 4	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 480 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	1,900 Ft.	GRAVELLY SILT LOAM	> 10 FT

OUTFALL NO. 5	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 480 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	1,900 Ft.	GRAVELLY SILT LOAM	> 10 FT

OUTFALL NO. 6	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 560 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	1,900 Ft.	GRAVELLY SILT LOAM	> 10 FT

OUTFALL NO. 7	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 560 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	1,900 Ft.	GRAVELLY SILT LOAM	> 10 FT

OUTFALL NO. 8	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 800 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,200 Ft.	SANDY SILT LOAM	> 10 FT

OUTFALL NO. 9	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 880 Gal/Day
------------------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,100 Ft.	SANDY SILT LOAM	> 10 FT

OUTFALL NO. 10	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 2,000 Gal/Day
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FACE DISCHARGE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
---	------------------------------------	----------------	------------------

SURFACE DISCHARGE <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Table
	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,100 Ft.	SANDY SILT LOAM	> 10 FT

APPLICANT NO.	NY- 014 4983	
EFFECTIVE DATE	4-1-2008	EXPIRATION DATE 3-31-2018
PAGE	3	OF 7

APPLICATION FORM "D" FOR A STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES) PERMIT

Continuation Sheet for Multiple Outfalls

LEASE PRINT OR TYPE

OWNER'S NAME (Corporate, Partnership or Individual)

HOWARD SMITH

IF RENEWAL OR MODIFICATION, GIVE PREVIOUS NO.

NY-014 4983

CITY NAME

BLACK BEAR CAMP GROUND

CITY, TOWN OR VILLAGE

WARWICK

COUNTY

ORANGE

DISCHARGE DATA (Use additional forms, if necessary) (See Instructions)

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 1,760 Gal/Day
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FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,500 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 1,040 Gal/Day
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FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,500 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 1,680 Gal/Day
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FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,700 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 480 Gal/Day
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FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,700 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 560 Gal/Day
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FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,700 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 480 Gal/Day
-----------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,700 Ft.	SHALY SILT LOAM	>10 FT

TFALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	<input type="checkbox"/> Replacement <input type="checkbox"/> Expansion	TYPE OF WASTE SEPTIC EFFLUENT	TYPE OF TREATMENT SEPTIC TANK W/TRENCH	DESIGN FLOW 480 Gal/Day
-----------	---	--	----------------------------------	---	----------------------------

FACE DISCHARGE	If "Yes", Name of Receiving Waters	Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

3SURFACE DISCHARGE	If "Yes", Name of nearest Surface Water	Distance	SOIL TYPE	Depth to Water Tab
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	UNKNOWN TRIBUTARY TO QUAKER CREEK	2,700 Ft.	SHALY SILT LOAM	>10 FT

APPLICATION FORM "D" FOR A STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES) PERMIT

Continuation Sheet for Multiple Outfalls

LEASE PRINT OR TYPE)

OWNER'S NAME (Corporate, Partnership or Individual)		IF RENEWAL OR MODIFICATION, GIVE PREVIOUS NO	
HOWARD SMITH		NY - 014 4983	
CITY NAME		CITY, TOWN OR VILLAGE	COUNTY
BLACK BEAR CAMPGROUND		WARWICK	ORANGE
DISCHARGE DATA (Use additional forms, if necessary) (See Instructions)			
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
18		SEPTIC EFFLUENT	SEPTIC TANK W/TRENCH
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
UNNAMED TRIBUTARY TO QUAKER CREEK		2,700 Ft.	SHALY SILT LOAM
Depth to Water Table		DESIGN FLOW	
710 FT		560 Gal/Da	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
19		SEPTIC EFFLUENT	SEPTIC TANK W/TRENCH
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
UNNAMED TRIBUTARY TO QUAKER CREEK		2,700 Ft.	SHALY SILT LOAM
Depth to Water Table		DESIGN FLOW	
710 FT		480 Gal/Da	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	
FALL NO.	<input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Existing	TYPE OF WASTE	TYPE OF TREATMENT
SURFACE DISCHARGE		Classification	Waters Index No.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If "Yes", Name of nearest Surface Water		Distance	SOIL TYPE
Depth to Water Table		DESIGN FLOW	

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
STATE POLLUTANT DISCHARGE ELIMINATION SYSTEM (SPDES)
DISCHARGE PERMIT**

OTHER CONDITIONS

GENERAL

This permit is issued under the provisions of Article 17 of the Environmental Conservation Law (ECL) and is further subject to the following additional conditions:

1. THAT the permit shall be maintained on file by the permittee.
2. THAT the permit is revocable or subject to modification or change pursuant to Article 17 of the ECL.
3. THAT issuance of this permit by the department and the receipt thereof by the applicant does not supersede, revoke or rescind an order of modification thereof on consent or determination by the Commissioner issued heretofore by the department or any of the terms, conditions or requirements contained in such order or modification thereof.
4. THAT all discharges authorized by this permit shall be consistent with the provisions, terms, requirements and conditions of this permit.
5. THAT facility expansions, production increases or process modification by the permittee which result in new or increased discharges or pollutants into the waters of the state shall be reported by the permittee by submission of a new SPDES application.
6. THAT the discharge of any pollutant not identified and authorized by this permit or the discharge of any pollutant more frequently than or at a level in excess of that permitted by this permit shall constitute a violation of the terms of the permit.
7. THAT this permit may be modified, suspended or revoked where the department finds:
 - a. A violation of any terms of the permit;
 - b. That the permit was obtained by misrepresentation or failure to disclose fully all relevant facts, or;
 - c. A change in conditions or the existence of a condition which requires either a temporary or permanent reduction or elimination of the authorized discharge.
8. THAT the facilities shall not receive or be committed to receive wastes beyond their design capacity as to volume and character of wastes treated, nor shall the facilities be changed or modified or otherwise altered as to type, degree or capacity of treatment provided, disposal of treated effluent, or treatment and disposal of separated scum, liquids, solids or combinations thereof resulting from the treatment process without prior written approval of the designated field office.
9. THAT the facilities shall be continuously operated and maintained to the satisfaction of the Commissioner and to comply with the Environmental Conservation Law and all applicable laws, ordinances, codes, rules and regulations.

ADDITIONAL CONDITIONS - SUBSURFACE SYSTEMS

1. The Final Effluent Limitation for this permit is a flow limit of 16,000 gallons per day.
2. Monitoring, Recording and Reporting requirements: None
3. In accordance with the Special Conditions - Proposed or Expanded Facilities, the permittee shall obtain final approval of plans for the waste disposal facilities from the:

New York State Department of Environmental Conservation
Regional Water Engineer
Region 3
21 South Putt Corners Road
New Paltz, NY 12561

SEE MAPS

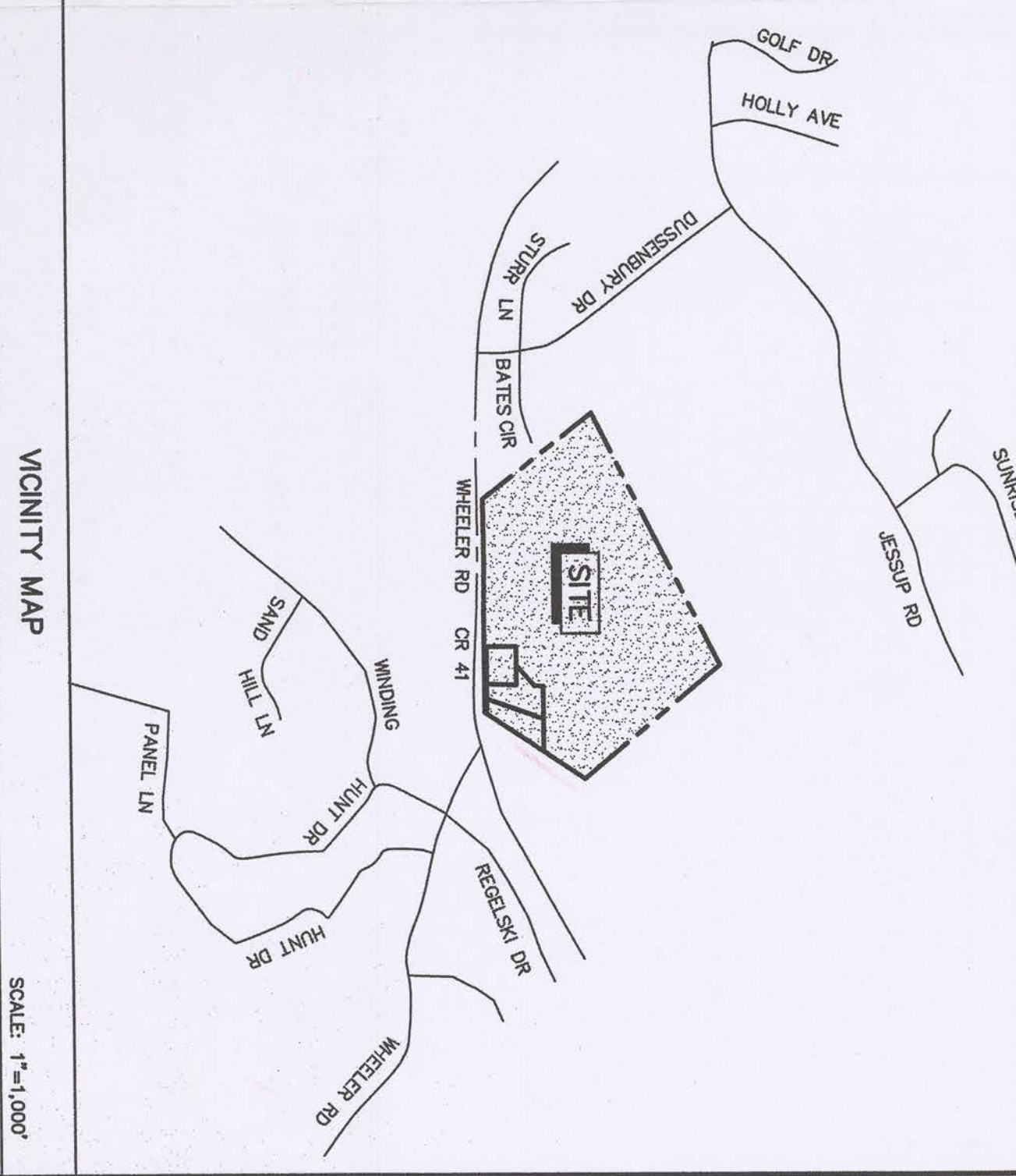
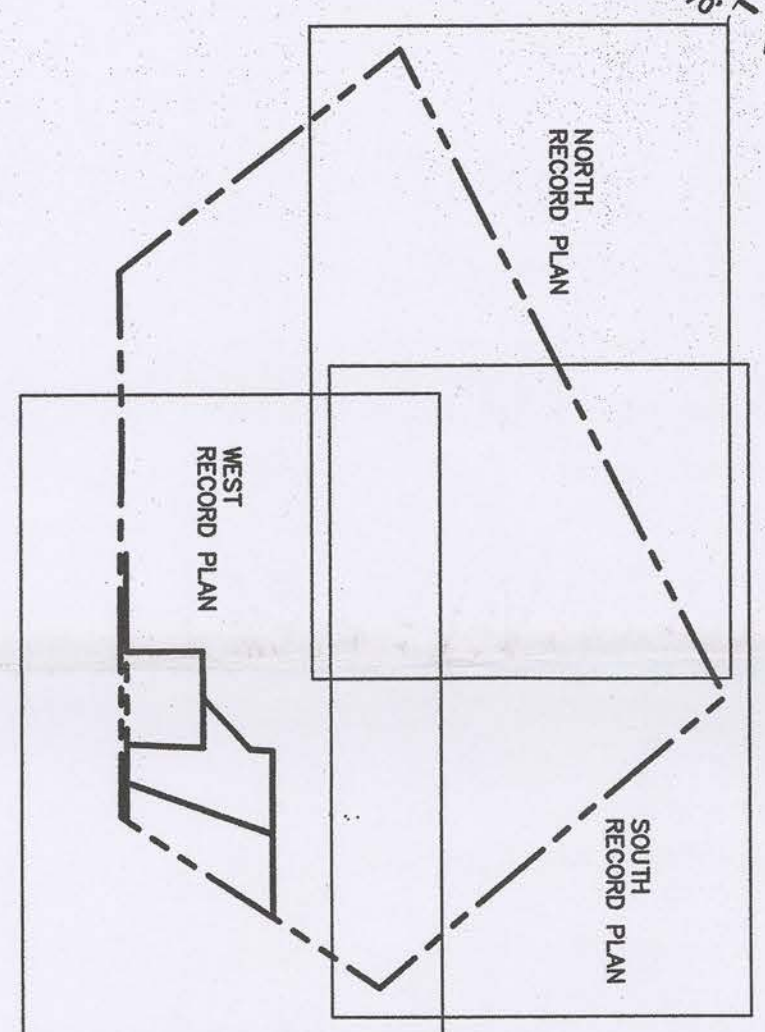
Black Bear Campground

DWG. NOS. C-1, C-3, and C-4

- LEGEND
- PROPERTY LINE
 - EASEMENT
 - SETBACK
 - CAMP SITE
 - EXISTING TREE LINE
 - EXISTING CONTOUR
 - EXISTING FENCE LINE
 - EXISTING STREAM
 - PAVED ROAD
 - UNPAVED TRAIL

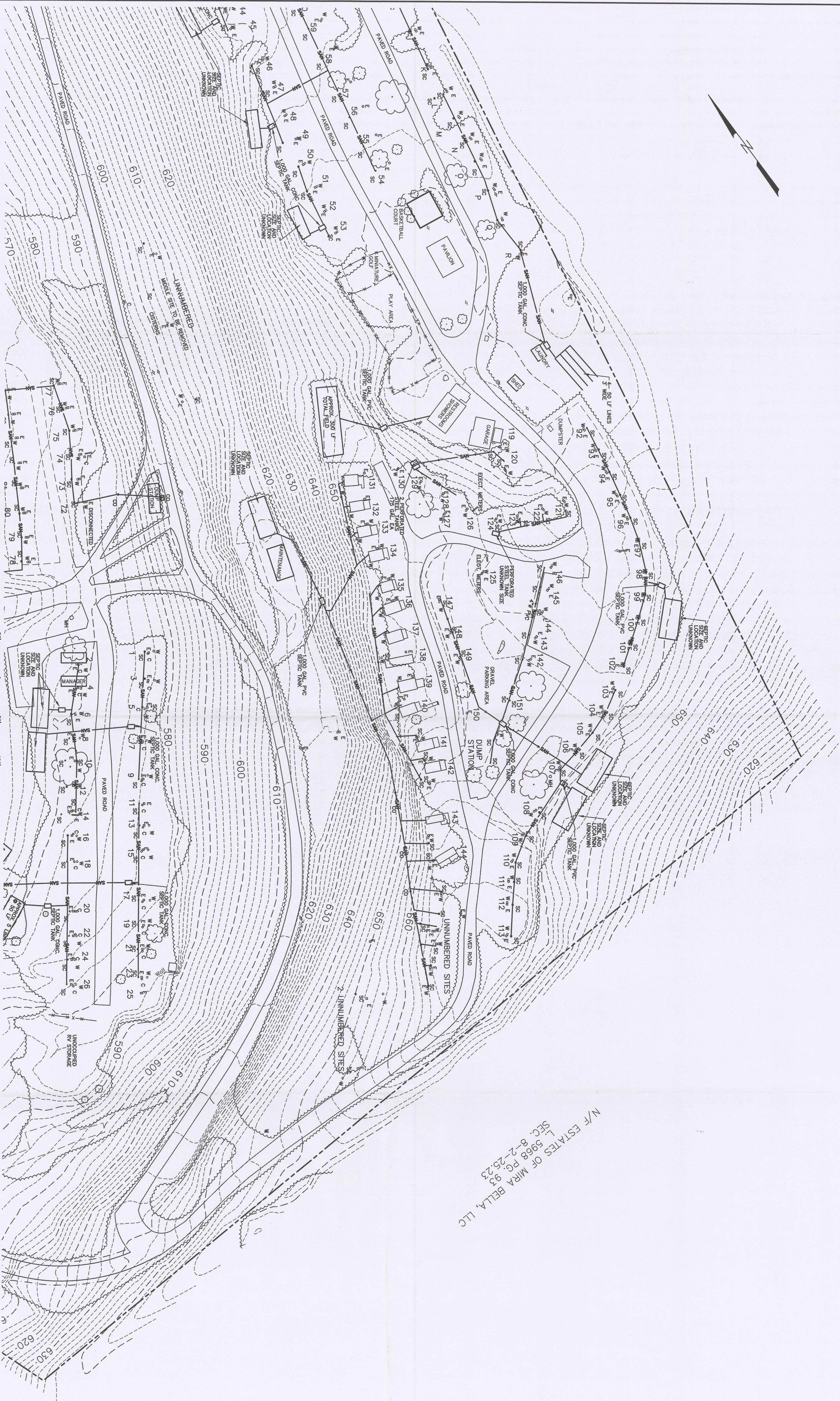
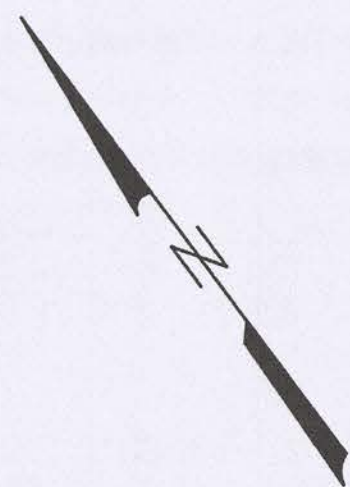


SHEET INDEX



- GENERAL NOTES:
1. RECORD OWNER AND APPLICANT:
HOWARD SMITH
BLACK BEAR CAMPGROUND
197 WHEELER ROAD
FLORIDA, NY 10821
 2. TAX MAP NUMBER:
SECTION 8, BLOCK 2, LOTS 2711, 2712, 2713, 2714
 3. DEED REFERENCE:
S-B-L, B-2-2714, LIBER 2264, PAGE 617
 4. AREA:
56.217 ACRES
 5. ZONING DISTRICT: RU RURAL
LOT AREA: 10 AC
FRONT YARD: 100' MIN.
SIDE YARD: 50' MIN.
REAR YARD: 100' MIN.
SETBACK: 100' MIN.
BUILDING HEIGHT: 35' MAX.
BUILDING COVERAGE: 30%
 6. BASE MAP INFORMATION TAKEN FROM THE FOLLOWING SOURCE:
A. BOUNDARY TAKEN FROM "SUBDIVISION OF LANDS OF HOWARD SMITH & JOHN P. SEYMOUR, TOWN OF WARWICK, ORANGE COUNTY, NEW YORK, PREPARED BY CHARLES V. WALLACE, L.S. DATED DECEMBER 6, 1980."
B. TOPOGRAPHIC DATA TAKEN FROM "TOPOGRAPHIC MAP OF TAX MAP SECTION 8, BLOCK 2, LOTS 2711, 2712, 2713, 2714, ORANGE COUNTY, NEW YORK, PREPARED BY MARCO WEST MILFORD, NEW JERSEY, DATED SEPTEMBER 23, 2008."
C. UTILITIES FIELD LOCATED BY M&S ENGINEERING & LAND SURVEYING, P.C., OCTOBER, 2008.
 7. CALL BEFORE YOU DIG UNDERGROUND FACILITIES PROTECTIVE ORGANIZATION TWO (2) FULL WORKING DAYS BEFORE YOU DIG. CALL 1-800-882-7862.
 8. IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE A LICENSED PROFESSIONAL ENGINEER, ARCHITECT, LANDSCAPE ARCHITECT, OR LAND SURVEYOR, TO ALTER ANY ITEM IN ANY WAY. IF ANY ALTERATION IS MADE TO ANY ITEM, THE PROFESSIONAL ARCHITECT OR LAND SURVEYOR SHALL STAMP THE DOCUMENT WITH THEIR NAME AND A SPECIFIC DESCRIPTION OF THE ALTERATION.

NO.		DATE		REVISION		BY		CK.		DRAWN BY: P. HUTTON		DEPT. CK. M. SANDOR		DEF. APPR.		COORD. CK.		P.M. APPR.		CLIENT APPR.		SHEET TITLE:		JOB NAME:		DATE: 8/30/2013		JOB NO. 070138.01		REV. NO. A	
A		8/30/2013		PROGRESS PRINT						MICHAEL J. SANDOR PE		NY PROFESSIONAL ENGINEER NO. 60445										OVERALL PLAN		BLACK BEAR CAMPGROUND		TOWN OF WARWICK, ORANGE COUNTY, NEW YORK		SCALE: 1"=100'		C-1	



W/F ESTATES OF MIRA BELLA, LLC
SEC. 8-2-23, 23
L. 5968 PG. 93

NO.		DATE		REVISION		BY		CK.	
A		8/20/2013		PROGRESS PRINT		PAH		M.S.	
MICHAEL J. SANDOR, P.E.		NY PROFESSIONAL ENGINEER NO. 60445							
DRAWN BY: P. HUTTON		DEPT. CR. M. SANDOR		COORD. CK.		P.M. APRR.		CLIENT APPR.	
MJS ENGINEERING & LAND SURVEYING, PC		251 Greenwich Ave		845-231-1860		Fax 845-231-8657			
SHEET TITLE:		JOB NAME:		DATE: 8/01/2013		JOB NO. 070138.01		REV. NO. A	
SOUTH RECORD PLAN		BLACK BEAR CAMPGROUND		TOWN OF WARWICK, ORANGE COUNTY, NEW YORK		SCALE: 1"=50'		C-3	
								SHEET 3 OF 4	

N/F GIORA NEEMAN
L. 2163 PG. 434
SEC. 8-2-26.52

NO.	DATE	REVISION
A	8/30/2013	PROGRESS PRINT
		BY CK.
		MS.

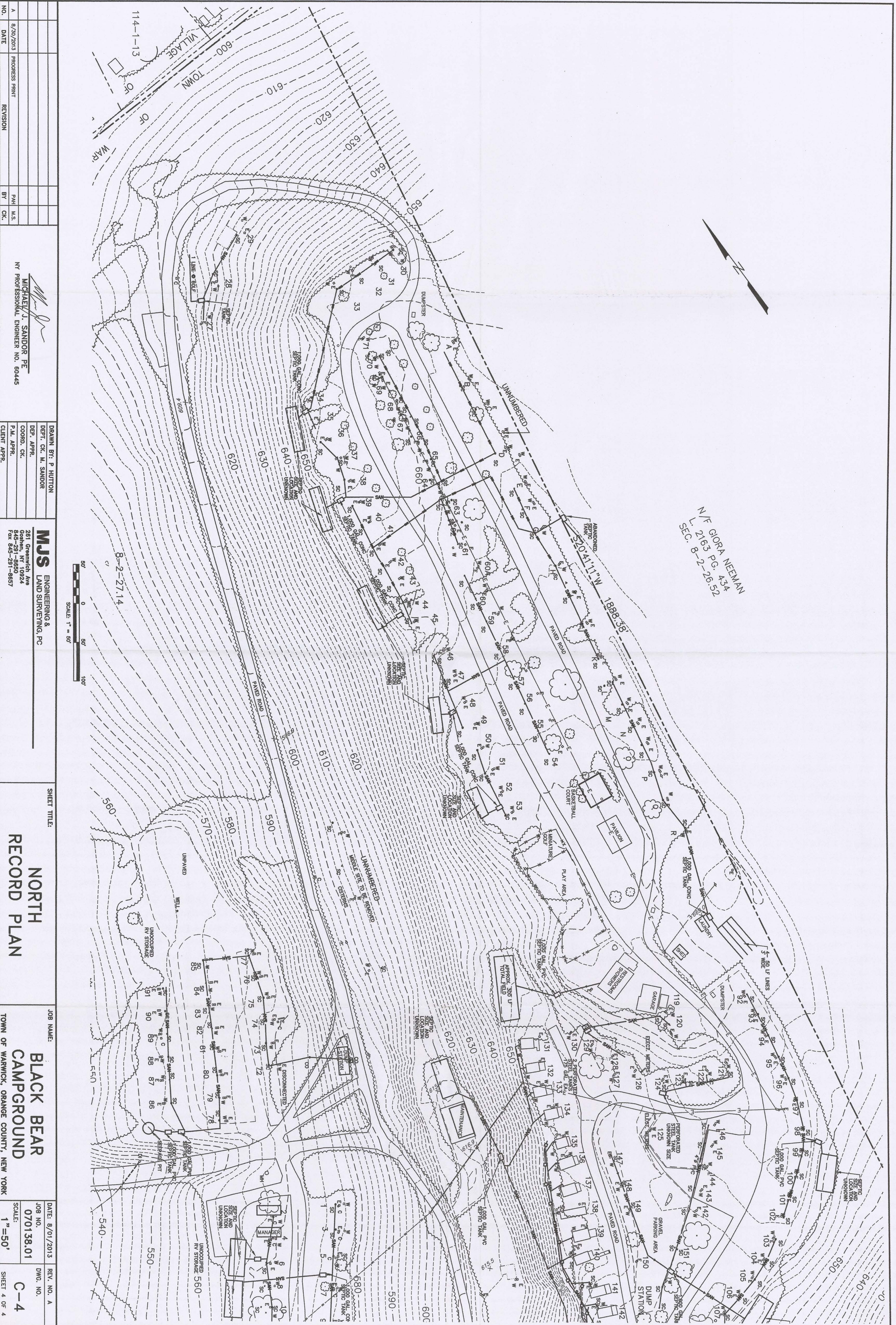
MICHAEL J. SANDOR, P.E.
NY PROFESSIONAL ENGINEER NO. 60445

MJS ENGINEERING &
LAND SURVEYING, PC
261 Greenwich Ave
New York, NY 10003
Tel: 845-291-8650
Fax: 845-291-8657

SHEET TITLE:
NORTH
RECORD PLAN

JOB NAME:
BLACK BEAR
CAMPGROUND
TOWN OF WARWICK, ORANGE COUNTY, NEW YORK

DATE: 8/01/2013
JOB NO. 070138.01
SCALE: 1"=50'
REV. NO. A
DWC. NO.
C-4
SHEET 4 OF 4





Edward A. Diana
County Executive

DEPARTMENT OF HEALTH

Eli N. Avila, MD, JD, MPH, FCLM
Commissioner of Health

124 Main Street
Goshen, New York 10924-2199

Environmental Health

(845) 291-2331
Fax: (845) 291-4078

October 28, 2013

MJS Eng. & L.S., P.C.
261 Greenwich Ave.
Goshen, NY 10924

Attention: Michael J. Sandor, P.E.

Re:
Sewage Disposal Systems
Black Bear Campground
T. Warwick

Dear Mr. Sandor:

In reply to your letter dated 10/25/13, we will consider the proposed pipe replacement acceptable to serve sites 131-144. We cannot, however, consider it acceptable to serve any unnumbered sites until these sites have been properly numbered and the adequacy of the sewage disposal system to serve these sites has been justified.

We understand that you are currently working on the design of replacement sewage disposal systems. We remain concerned regarding the ability of our office to issue a conditional operating permit for 2014 since it is unlikely that this matter will be completely resolved prior to 1/1/14. We request that a draft compliance schedule be submitted to this office by 11/15/13 for our review and acceptance recognizing that the sites available for occupancy on 1/1/14 may be limited until all compliance issues have been satisfactorily resolved.

Very truly yours,

Edwin L. Sims, P.E.
Acting Dir. of Env. Health/
Principal Public Health Engineer
ELS/ajc

cc: Howard Smith
Alan Lipman
USEPA
NYSDEC
NYSDOH
T. Warwick
File (2)